

ATTACHMENT 4

DECLARATION OF JAY M. BRADBURY



## Acknowledgment Notification

(1) Change Request Log #	<u>CR0520</u>	(2) Date Change Request Submitted:	<u>10/12/01</u>
(4) Internal Reference #:	<u></u>	(3) Date Change Request Received:	<u>10/12/01</u>
(6) Company Name:	<u>AT&amp;T</u>	(5) Date of Notification:	<u>10/12/01</u>
(7) Title of Change	<u>LENS/TAG miscalculation of UNE P Due Dates</u>		
(8) Request Category:	<u>Defect</u>		
(9) Response due by:	<u>10/15/01</u>		
(10) BCCM Contact name	<u>Steve Hancock</u>	(11) Phone #	<u>205-321-2111</u>

To be completed by BCCM only: Date Sent: 10/12/01

<b>(1) CHANGE REQUEST LOG #</b>	<b>CR0520</b>
<b>(2) STATUS</b>	N

To be completed by CCM or BellSouth:

<b>(3) REQUEST TYPE</b>	<input type="checkbox"/> TYPE 2 (REGULATORY)	<input type="checkbox"/> TYPE 3 (INDUSTRY)	<input type="checkbox"/> TYPE 4 (BST)	<input type="checkbox"/> TYPE 5 (CLEC)
	<input checked="" type="checkbox"/> TYPE 6 (DEFECT) NOTE: COMPLETE SECTION 2	<input type="checkbox"/> EXPEDITED FEATURE	<input type="checkbox"/> FLOW-THRU	

**SECTION 1**

<b>(4) COMPANY NAME</b>	AT&T
<b>(5) OCN</b>	8392,8300
<b>(6) CCM NAME</b>	Bernadette Seigler
<b>(7) TELEPHONE NUMBER</b>	404-810-8956
<b>(8) CCM EMAIL ADDRESS</b>	bseigler@att.com
<b>(9) CCM FAX NUMBER</b>	404-810-8605
<b>(10) ALTERNATE CCM NAME</b>	Donna Cain
<b>(11) ALTERNATE PHONE NUMBER</b>	404-810-3352
<b>(12) ORIGINATOR'S NAME</b>	Bernadette Seigler
<b>(13) ORIGINATOR'S PHONE NUMBER</b>	404-810-8956
<b>(14) TITLE OF CHANGE REQUEST</b>	LENS/TAG miscalculation of UNE P Due Dates

<b>(15) CATEGORY</b>	<input type="checkbox"/> ADD NEW FUNCTIONLITY	<input checked="" type="checkbox"/> CHANGE EXISTING
<b>(16) DESIRED DUE DATE</b>	10/15/01	

<b>(17) ORIGINATING CCM ASSESSMENT OF IMPACT</b>	<input checked="" type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM	<input type="checkbox"/> LOW
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Attachment A-4A

Jointly Developed by the Change Control Sub-team comprised  
of BellSouth and CLEC Representatives.

**(18) ORIGINATING CCM  
ASSESSMENT OF PRIORITY**

☒ URGENT

☐ HIGH

☐ MEDIUM

☐ LOW

**(19) INTERFACES IMPACTED**

**PRE-ORDERING**

☒ LENS

☒ TAG

☐ CSOTS

**ORDERING**

☐ EDI

☒ LENS

☐ TAG

☐ LNP

**MAINTENANCE**

☐ TAFI

☐ EC-TA Local

**MANUAL**

☐ Manual

**(20) TYPE OF CHANGE** (Check one or more,  
as applicable)

☒ Software

☐ Product & Services

☐ Documentation

☐ Hardware

☐ New or Revised Edits

☐ Regulatory

☐ Industry Standards

☐ Process

☐ Other

☒ Defect

☐ Expedited Feature

☐ Flow Through

**(21) DESCRIPTION OF REQUESTED  
CHANGE (Including purpose and  
benefit received from this change.  
Include attachments if available)**

Want standard due dates calculated correctly for orders submitted in LENS. 40-50% of our UNE P orders submitted through LENS since October 1, 2001 have received greater than standard interval Due Dates.

EC support and Account Team have offered no explanation. We experienced this problem back in June & July.

Here's the timeline:

FIRST PROBLEM:

June 6, 2001 - BST released TAG 7.6 and LNP 6.2

June 8 & 9, 2001 - BST backed out of production LNP Rel 6.2 due to system issues & removed CR 226 - removed calculator correct due date intervals from LNP 6.1.3

July 28, 2001 - **CR 445** was the CR # for the fix for this Due Date calculation defect

SECOND PROBLEM:

Sept 29, 2001 - BST released LNP 6.3

Sept 30, 2001 - BST releases TAG 7.6.2

OCTOBER 1 - AT&T sees incorrect intervals again. Same types of software release have proceeded the start of the due date calc defect. 18 PON Examples are at the bottom of this CR.

**(22) REQ TYP(s) IMPACTED:**

MB

**(23) ACT TYP(s) IMPACTED:**

V, P Q

**(24) PROVIDE EXAMPLE OF  
REQUESTED CHANGE:**

Over 40% of PONS since October 1<sup>st</sup> have received an intervals longer than standard - from 2 days to 4 days where it should be 0 to 1 day interval.

**(25) Identify the LSOG versions  
that are affected by this change**

OSS99/LSOG4

*This section to be completed by BellSouth only:*

**(26) Does this request require  
clarification?**

☐ YES

☐ NO

Attachment A-4A

(27) Clarification Request Sent	
(28) Clarification Response Due	

(29) Change Request Review Date	
(30) Target Implementation Date	
(31) Change Review Meeting Results	

(32) CANCELED CHANGE REQUEST	<input type="checkbox"/> DUPLICATE	<input type="checkbox"/> TRAINING	<input type="checkbox"/> CLARIFICATION NOT RECEIVED
(33) CANCELTION ACKNOWLEDGMENT	<input type="checkbox"/> CLEC	<input type="checkbox"/> BST	DATE: _____

(34) APPEAL	<input type="checkbox"/> YES	<input type="checkbox"/> NO
(35) APPEAL CONSIDERATIONS		

## SECTION 2

This section to be completed by CLEC/BellSouth- External Explanation of Type 6 Defect Change Request

(36) PON #	
(37) ERROR MESSAGE:	
(38) RELEASE OR API VERSION (If applicable)	
(39) DESCRIPTION OF DEFECT SCENARIO:	

## SECTION 3

This section to be completed by BellSouth – Internal Validation of Defect Change Request

(40) DEFECT VALIDATION RESULTS:	
(41) CLARIFICATION NEEDED:	<input type="checkbox"/> YES <input type="checkbox"/> NO
(42) VALIDATED DEFECT IMPACT LEVEL:	<input type="checkbox"/> HIGH <input type="checkbox"/> MEDIUM <input type="checkbox"/> LOW
(43) VALIDATION TYPE:	<input type="checkbox"/> DEFECT <input type="checkbox"/> FEATURE <input type="checkbox"/> TRAINING ISSUE <input type="checkbox"/> DUPLICATE
(44) DEFECT IMPACTS OTHER CLECS?	<input type="checkbox"/> YES <input type="checkbox"/> NO
(45) INTERFACES IMPACTED BY DEFECT:	<input type="checkbox"/> EDI <input type="checkbox"/> TAG <input type="checkbox"/> LNP <input type="checkbox"/> LENS <input type="checkbox"/> TCIF 7 <input type="checkbox"/> TCIF 9
(46) TARGET IMPLEMENTATION DATE:	

fields will be validated before change request is returned for clarification.

PON	Version	Date Submitted	Due Date	Completion Date	FOC	CN	Error/Clarification	Order Status	LSR Status
JCVY010132 7	03	2001-10-01	2001-10-04	2001-10-04	2001-10-01	2001-10-04	2001-10-01	CP	CN

Attachment A-4A

<u>JCVY010143</u> <u>5</u>	00	2001-10-10	2001-10-16		2001-10-11		2001-10-10	AO	FOC
<u>JCVY010143</u> <u>6A</u>	00	2001-10-02	2001-10-04	2001-10-04	2001-10-03	2001-10-04	2001-10-02	CP	CN
<u>JCVY0101</u> <u>460</u>	00	2001-10-02	2001-10-05	2001-10-05	2001-10-02	2001-10-05	2001-10-02	CP	CN
<u>JCVY01014</u> <u>62</u>	00	2001-10-01	2001-10-04	2001-10-04	2001-10-01	2001-10-04		CP	CN
<u>JCVY01014</u> <u>67</u>	00	2001-10-02	2001-10-08	2001-10-08	2001-10-02	2001-10-08		CP	CN
<u>JCVY01014</u> <u>75</u>	00	2001-10-02	2001-10-05	2001-10-05	2001-10-02	2001-10-05	2001-10-02	CP	CN
<u>JCVY0101</u> <u>487</u>	00	2001-10-04	2001-10-09	2001-10-09	2001-10-04	2001-10-09	2001-10-04	CP	CN
<u>JCVY0101</u> <u>494</u>	00	2001-10-05	2001-10-10	2001-10-10	2001-10-06	2001-10-10	2001-10-05	CP	CN
<u>JCVY0101</u> <u>495</u>	00	2001-10-04	2001-10-09	2001-10-09	2001-10-04	2001-10-09		CP	CN
<u>JCVY0101</u> <u>501</u>	00	2001-10-08	2001-10-11	2001-10-11	2001-10-08	2001-10-11	2001-10-08	CP	CN
<u>JCVY0101</u> <u>503</u>	00	2001-10-05	2001-10-09	2001-10-09	2001-10-05	2001-10-09		CP	CN
<u>JCVY0101</u> <u>511</u>	00	2001-10-09	2001-10-12		2001-10-10		2001-10-09	PD	FOC
<u>JCVY0101</u> <u>515</u>	00	2001-10-09	2001-10-12		2001-10-09		2001-10-09	AO	FOC
<u>JCVY0101</u> <u>525</u>	00	2001-10-10	2001-10-13		2001-10-11			PD	FOC
<u>MIAY01149</u> <u>82B</u>	00	2001-10-08	2001-10-13		2001-10-08			PD	FOC

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Attachment A-4A

Jointly Developed by the Change Control Sub-team comprised  
of BellSouth and CLEC Representatives.

**SATURDAY DUE DATE WAS PROVIDED on 2 PONS ABOVE YET WAS NOT REQUESTED**

<u>MIAY011171</u> <u>7DEB</u>	00	2001-10-03	2001-10-08	2001-10-08	2001-10-08	2001-10-08	2001-10-03	CP	CN
<u>MIAY01145</u> <u>49</u>	04	2001-10-03	2001-10-09	2001-10-09	2001-09-17	2001-10-09		CP	CN

ATTACHMENT 5

DECLARATION OF JAY M. BRADBURY



To be completed by BCCM only: 07/12/01

(1) CHANGE REQUEST LOG  
#

CR 0445

(2) STATUS N

To be completed by CCM or BellSouth:

(3) REQUEST TYPE

☐ TYPE 2  
(REGULATORY)

☐ TYPE 3  
(INDUSTRY)

☐ TYPE 4 (BST)

☐ TYPE 5 (CLEC)

☒ TYPE 6  
(DEFECT) NOTE:  
COMPLETE SECTION 2

☐ EXPEDITED  
FEATURE

☐ FLOW-THRU

SECTION 1

(4) COMPANY NAME

AT&T

(5) OCN

8392,8300

(6) CCM NAME

Bernadette Seigler

(7) TELEPHONE NUMBER

404-810-8956

(8) CCM EMAIL ADDRESS

bseigler@att.com

(9) CCM FAX NUMBER

404-810-8605

(10) ALTERNATE CCM NAME

Donna Cain

(11) ALTERNATE PHONE NUMBER

404-810-3352

(12) ORIGINATOR'S NAME

Bernadette Seigler

(13) ORIGINATOR'S PHONE  
NUMBER

404-810-8956

(14) TITLE OF CHANGE REQUEST

LENS/TAG miscalculation of UNE P Due Dates

(15) CATEGORY

☐ ADD NEW FUNCTIONLITY

☒ CHANGE EXISTING

(16) DESIRED DUE DATE

7/13/01

(17) ORIGINATING CCM  
ASSESSMENT OF IMPACT

☒ HIGH

☐ MEDIUM

☐ LOW

Attachment A-4A

Jointly Developed by the Change Control Sub-team comprised  
of BellSouth and CLEC Representatives.

<b>(18) ORIGINATING CCM ASSESSMENT OF PRIORITY</b>	<input checked="" type="checkbox"/> URGENT	<input type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM	<input type="checkbox"/> LOW
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<b>(19) INTERFACES IMPACTED</b>				
PRE-ORDERING	<input checked="" type="checkbox"/> LENS	<input checked="" type="checkbox"/> TAG	<input type="checkbox"/> CSOTS	
ORDERING	<input type="checkbox"/> EDI	<input checked="" type="checkbox"/> LENS	<input type="checkbox"/> TAG	<input type="checkbox"/> LNP
MAINTENANCE	<input type="checkbox"/> TAFI	<input type="checkbox"/> EC-TA Local		
MANUAL	<input type="checkbox"/> Manual			

<b>(20) TYPE OF CHANGE</b> (Check one or more, as applicable)				
<input checked="" type="checkbox"/> Software	<input type="checkbox"/> Product & Services	<input type="checkbox"/> Documentation	<input type="checkbox"/> Hardware	<input type="checkbox"/> New or Revised Edits
<input type="checkbox"/> Regulatory	<input type="checkbox"/> Industry Standards	<input type="checkbox"/> Process	<input type="checkbox"/> Other	<input type="checkbox"/> Defect
<input type="checkbox"/> Expedited Feature		<input type="checkbox"/> Flow Through		

<b>(21) DESCRIPTION OF REQUESTED CHANGE</b> (Including purpose and benefit received from this change. Include attachments if available)	Want standard due dates calculated correctly for orders submitted in LENS. 40-72% of our UNE P orders submitted through LENS since June 4, 2001 have received greater than standard interval Due Dates. Worked with EC support who provided a fix date of 7/1. EC said the problem was related to LNP software issues, even though UNE P doe not involve LNP. Fix was not delivered on 7/1. New fix date quoted is 7/28/01. 7/28 is unacceptable. BST Workarounds are not working. Acct Team said 7/10 that problem was in TAG software and is impacting other CLEC UNE P orders in addition to AT&T's. Where are the TAG and LENS system notifications? Why haven't any been posted?
<b>(22) REQ TYP(s) IMPACTED:</b>	MB
<b>(23) ACT TYP(s) IMPACTED:</b>	V, P Q
<b>(24) PROVIDE EXAMPLE OF REQUESTED CHANGE:</b>	72% of PONS sent 7/5 and 7/6 received incorrect interval. FOC'd due dates were 7/10 & 7/11 – 5 days out. Correct interval is same day or next day if sent after 3:00 PM. ATLY0104522 JCVY0100858 JCVY0100884 JCVY0100886 MIAP0104255 MIAY0108877A MIAY0108994A MIAY0109005 MIAY0109070 MIAY0109133 MIAY0109254 MIAY0109177 MIAY0109385 MIAY0109395 MIAY0109418 MIAY0109459 ORLY0102131

Attachment A-4A

Jointly Developed by the Change Control Sub-team comprised of BellSouth and CLEC Representatives.

	ATLY0104443 ==>ATLY0104444 ==>ATLY0104452 ==>
<b>(25) Identify the LSOG versions that are affected by this change</b>	OSS99/LSOG4

*This section to be completed by BellSouth only:*

<b>(26) Does this request require clarification?</b>	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
<b>(27) Clarification Request Sent</b>	
<b>(28) Clarification Response Due</b>	

<b>(29) Change Request Review Date</b>	
<b>(30) Target Implementation Date</b>	
<b>(31) Change Review Meeting Results</b>	

<b>(32) CANCELED CHANGE REQUEST</b>	<input type="checkbox"/> DUPLICATE <input type="checkbox"/> TRAINING <input type="checkbox"/> CLARIFICATION NOT RECEIVED
<b>(33) CANCELANATION ACKNOWLEDGMENT</b>	<input type="checkbox"/> CLEC <input type="checkbox"/> BST <b>DATE:</b>

<b>(34) APPEAL</b>	<input type="checkbox"/> YES <input type="checkbox"/> NO
<b>(35) APPEAL CONSIDERATIONS</b>	

## SECTION 2

*This section to be completed by CLEC/BellSouth- External Explanation of Type 6 Defect Change Request*

<b>(36) PON #</b>	
<b>(37) ERROR MESSAGE:</b>	
<b>(38) RELEASE OR API VERSION (If applicable)</b>	
<b>(39) DESCRIPTION OF DEFECT SCENARIO:</b>	

## SECTION 3

*This section to be completed by BellSouth – Internal Validation of Defect Change Request*

<b>(40) DEFECT VALIDATION RESULTS:</b>	07/13/01 – The 0-1 due date calculation for non-complex Port/Loop Res/Bus combinations will be implemented on 07/28/01 in Rel. 9.4. It is BellSouth's expectations that these due dates will apply to electronically generated
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		LSR's as appropriate. This implementation will apply to TCIF 9 only. A customer notification letter will be posted to the Interconnection website early next week. The current workaround will continue to be utilized until the correction is implemented.	
(41) CLARIFICATION NEEDED:		<input type="checkbox"/> YES	<input type="checkbox"/> NO
(42) VALIDATED DEFECT IMPACT LEVEL:		<input type="checkbox"/> HIGH	<input type="checkbox"/> MEDIUM <input type="checkbox"/> LOW
(43) VALIDATION TYPE:		<input type="checkbox"/> DEFECT	<input type="checkbox"/> FEATURE <input type="checkbox"/> TRAINING ISSUE <input type="checkbox"/> DUPLICATE
(44) DEFECT IMPACTS OTHER CLECS?		<input type="checkbox"/> YES	<input type="checkbox"/> NO
(45) INTERFACES IMPACTED BY DEFECT:		<input type="checkbox"/> EDI <input type="checkbox"/> TAG <input type="checkbox"/> LNP <input type="checkbox"/> LENS <input type="checkbox"/> TCIF 7 <input type="checkbox"/> TCIF 9	
(46) TARGET IMPLEMENTATION DATE:			

*fields will be validated before change request is returned for clarification.*

ATTACHMENT 6

DECLARATION OF JAY M. BRADBURY

## **CLOSURE REPORT FOR EXCEPTION 116**

BellSouth Georgia OSS Testing Evaluation

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Date: May 8, 2001

### **EXCEPTION CLOSURE REPORT**

#### **Exception:**

**Version 2.2.0.11 of BellSouth's TAG pre-order interface does not provide a Calculated Due Date (CDD) for UNE Loop-Port Combination service requests.**

#### **Summary of Exception:**

BellSouth's CDD pre-order query provides CLECs with the standard service provisioning interval for subsequent orders, based on the order requisition type (e.g., UNE Loop, UNE Port), activity type (e.g., disconnection, migration), quantity of lines, and product category identifier.

KPMG Consulting, Inc. (KCI) attempted to process a CDD for a UNE Loop-Port Combination request via TAG Version 2.2.0.11. Following the procedure outlined in the *Pre-Order Business Rules*, KCI populated the UNE Product Identifier field with a value of "0," representing a "NOTUNETOCALCULATE" entry<sup>1</sup>. Since UNE Loop-Port Combinations do not fall under Resale service, KCI entered "NOTRSTOCALCULATE" in the Resale Product Identifier field<sup>2</sup>.

KCI received the following error message via the TAG interface: "ILEC Exception, Invalid Data Exception – Invalid Data element: RSPROD, Error Code: TAG8008VAL, Msg Text: RSPROD REQUIRED."

The current Business Rules do not adequately explain the requirements for processing UNE Loop-Port Combination CDDs.

#### **Summary of BellSouth's Response:**

"Calculate Due Date for PreOrder (Version 2.2.0.11) has two fields:

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<sup>1</sup> According to Version 7 of the *Pre-Order Business Rules* (p. 258), Loop Port Combinations utilize a UNEPROD indicator of "0."

<sup>2</sup> The Pre-Order Business Rules did not address requirements for the RSPROD field.

## **CLOSURE REPORT FOR EXCEPTION 116**

### **BellSouth Georgia OSS Testing Evaluation**

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- RSPROD (Resale product category)
- UNEPROD (UNE product category)

Both have a list of valid values, however, Loop/Port Combo was inadvertently omitted from the UNEPROD product category. Therefore, when submitting a CDD Pre-Order transaction and when entering a "0" (zero) in both fields you will receive the following error:

'ILEC Exception, Invalid Data Exception - Invalid Data element: RSPROD, Error Code: TAG8008VAL, Msg Text: RSPROD REQUIRED.'

On an interim basis, when submitting a calculated due date transaction for REQTYPE M Loop/Port Combo you must populate the RSPROD field with 31 or 32. This is an interim solution that will be communicated to all TAG users via the Change Control Process that may be experiencing the same problem.

BellSouth will submit a Change Request as a feature against the requirements to process REQTYPE M as a UNE Loop/Port Combo. This feature will be submitted via the Change Control Process and scheduled for a future release."

#### **Summary of KCI Re-test Activities:**

KCI's re-test activities consisted of submitting four CDD pre-order transactions for UNE Loop-Port Combination customers following the rules outlined in the BellSouth-proposed workaround. In addition, KCI monitored BellSouth Carrier Notifications to ensure that an adequate description of the workaround was distributed to appropriate CLECs.

#### **KCI Re-test Results:**

All four re-test transactions were successfully processed by BellSouth's TAG interface Version 2.2.0.11. Utilizing this workaround, BellSouth's pre-order interface adequately provides functionality to process CDD pre-orders for Loop-Port Combination service requests.

BellSouth provided notification of this pre-order workaround to the CLEC community on December 29, 2000. A Change Control request to modify BellSouth code was also

## **CLOSURE REPORT FOR EXCEPTION**

**116**

BellSouth Georgia OSS Testing Evaluation

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submitted through the CLEC Change Control process. CR0237 was released published on December 11, 2001. An implementation date will be established in conjunction with documented Change Control procedures.



## **CLOSURE REPORT FOR EXCEPTION 116**

BellSouth Georgia OSS Testing Evaluation

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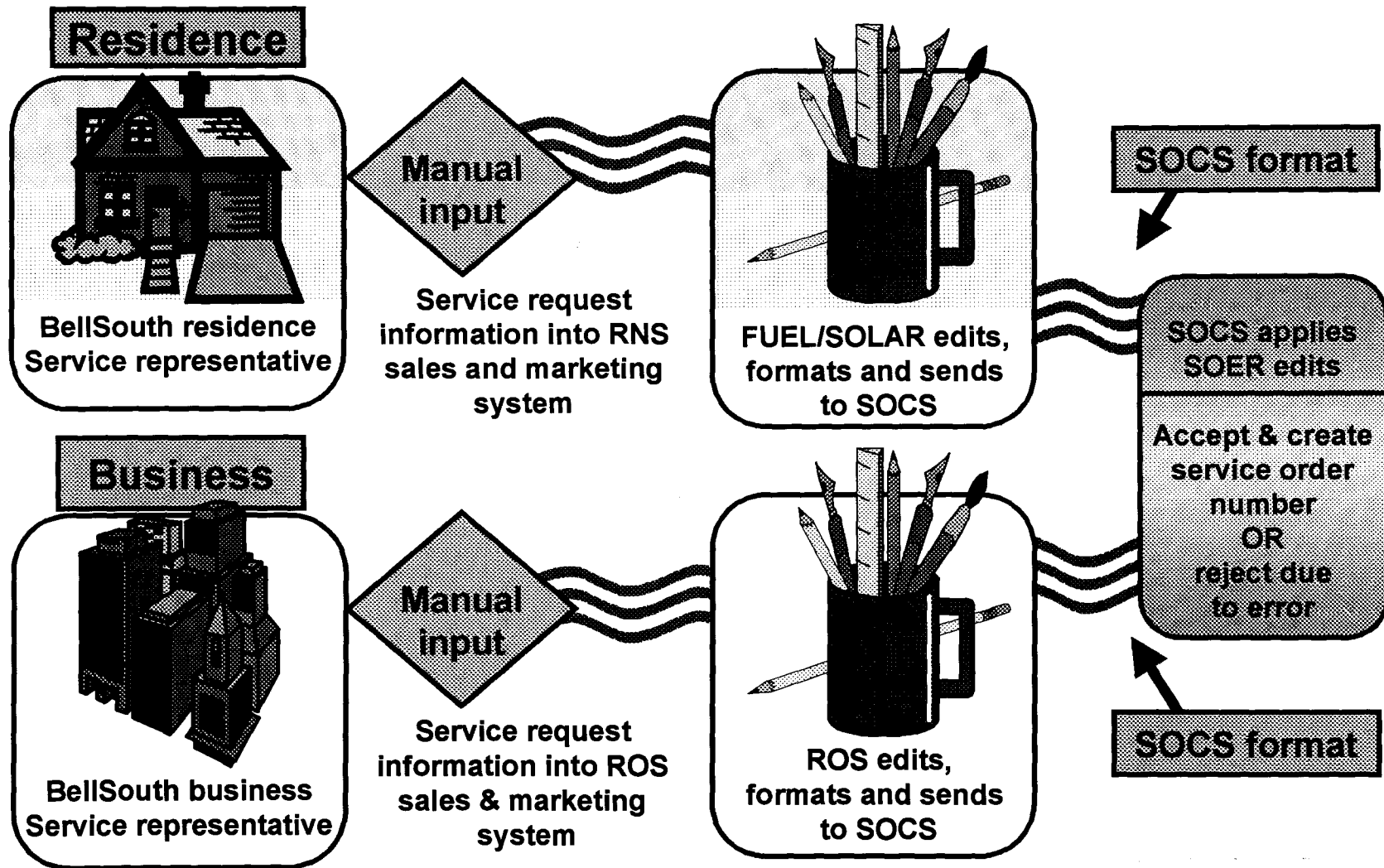
**As a result of re-test activities, KCI, with the concurrence of the Georgia Public Service Commission, closes Exception 116.**

**Attachments:** None.

ATTACHMENT 7

DECLARATION OF JAY M. BRADBURY

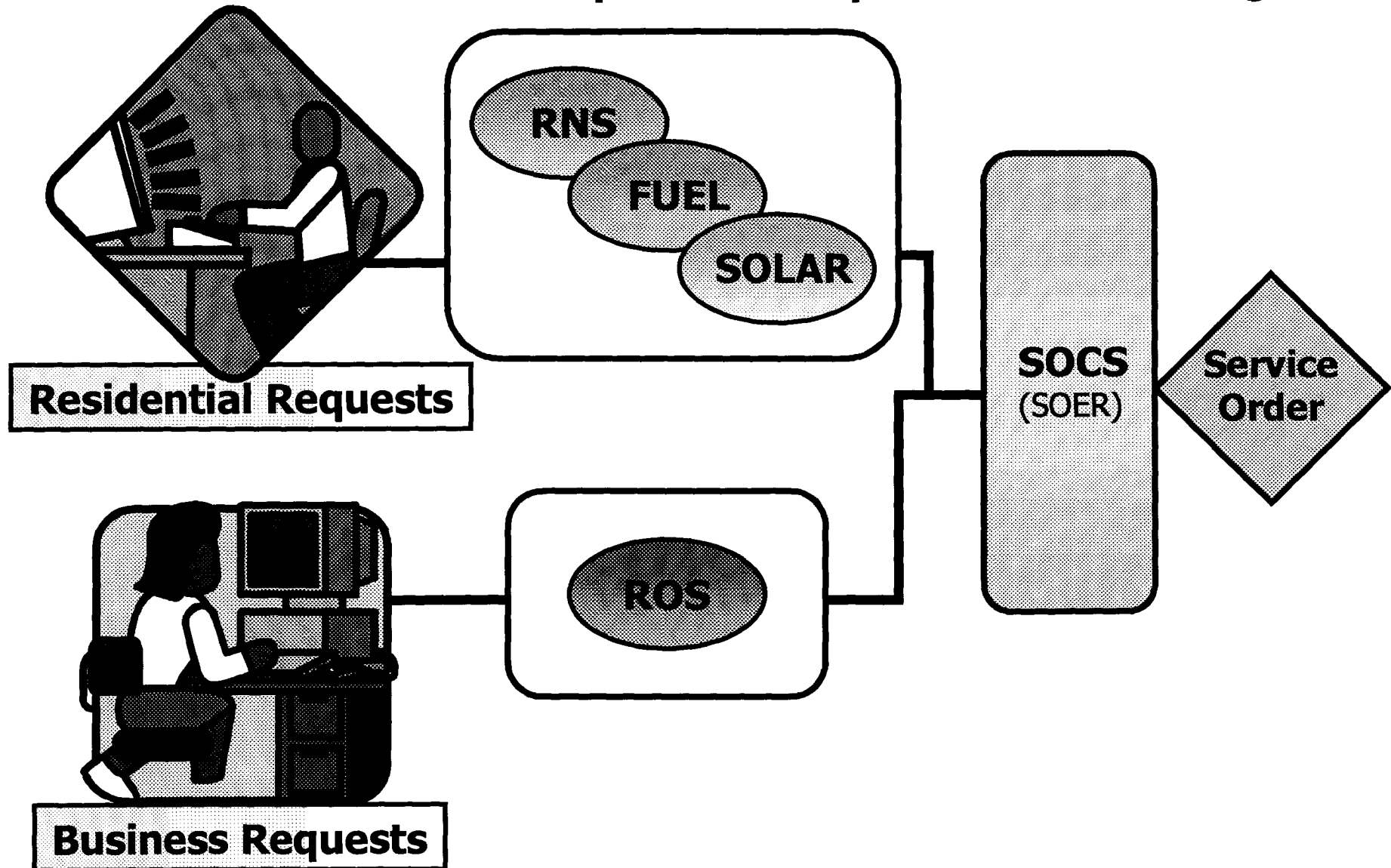
# How BellSouth service requests become service orders



**Service orders for BLS do not exist until acceptance by SOCS**

# BellSouth ordering methodology

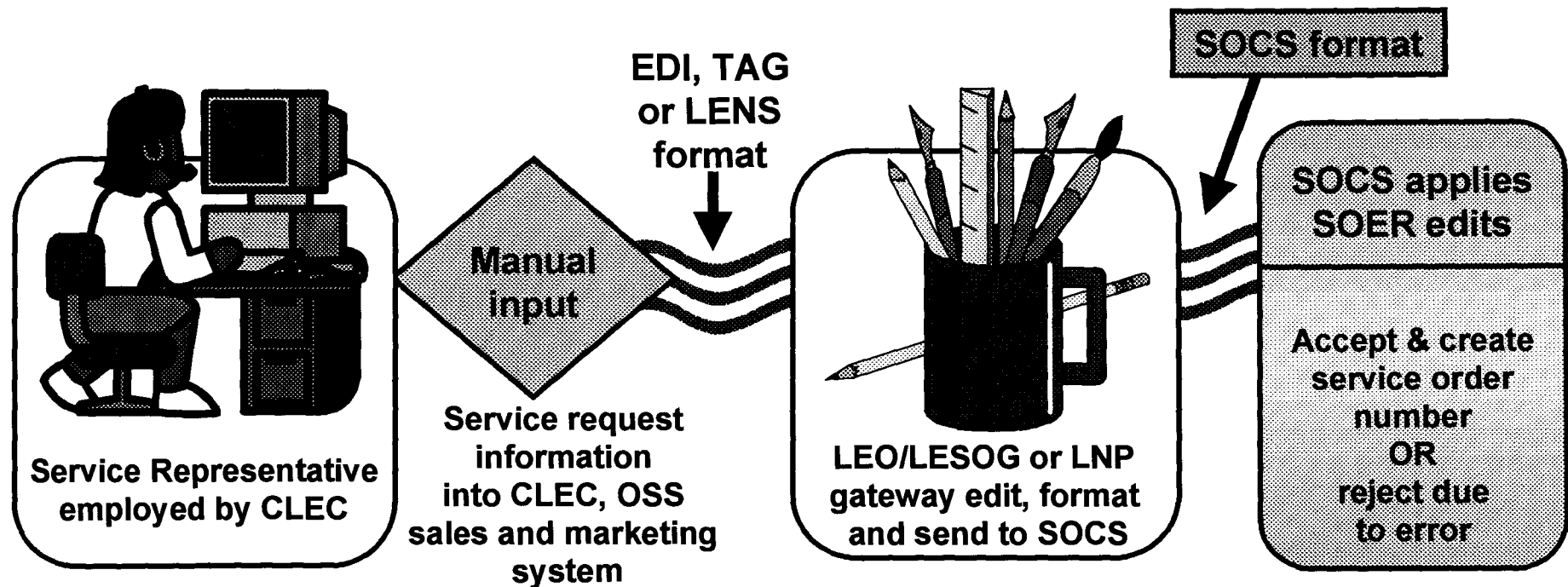
All BellSouth service requests are capable of flow-through



ATTACHMENT 8

DECLARATION OF JAY M. BRADBURY

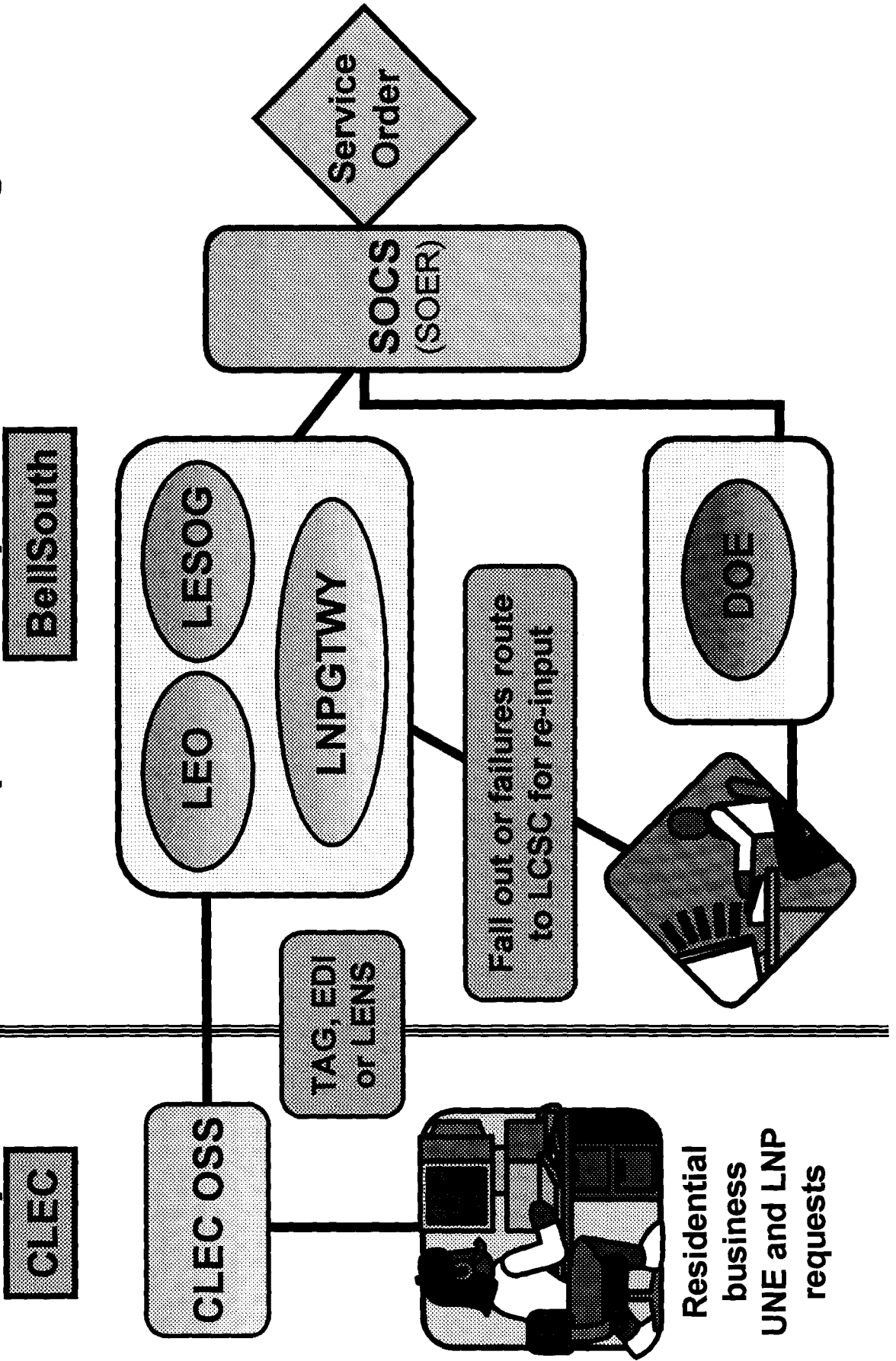
# How CLEC service requests become service orders



**Service orders for CLECs do not exist until acceptance by SOCS**

# CLEC ordering methodology

Only some CLP service requests are capable of flow-through



ATTACHMENT 9

DECLARATION OF JAY M. BRADBURY



## **Regional Testing of Bell South's Operational Support Systems**

### **Meeting Minutes – April 9, 2001 AM**

#### **Purpose**

To gain an understanding of the following items:

- Roles and responsibilities of the Re-Sale service representative
- Process Flow of the Re-sale orders
- Training and review of service representatives

#### **Meeting Attendees**

Ronald Taylor - PwC  
Joe Annoni - PwC  
Martino Stefanoni - PwC  
Giovani Blasi - PwC  
Meera R Puri - PwC  
Joanna Brandenburg - PwC  
Craig Atkinson - PwC  
Harriet Francis - Re-sale Service Representative Manager  
Bill Aguila - Subject Matter Expert 404-927-7098  
Michelle McRae - LCSC

#### **Roles and Responsibilities**

- Responsible for managing 10 representative's workflow (in, out times and accuracy).
- Goal for order entry turnaround is 18 hours (two workdays).
- Re-sale covers customer, business, LNE, and coin orders.

#### **Orders Processing**

- Orders are accessed through the F9 key. LEO is the primary application used by the Re-Sale group to access on-line LSRs.
- The office assistants distribute paper (Fax) orders to the representatives. The orders are pooled and then distributed equally to representatives by volume.
- The Load Manager balances the work to be distributed between locations Birmingham and Atlanta.
- A general re-sale order takes approximately 10 minutes.
- About 50% of the re-sale order are new connects, disconnects, changes (C orders)
- If order can not be worked then the representative returns it to the CLEC through LON (order tracker).

#### **Expedites and Escalations**

- Load managers receive the escalation request and communicate the request to the appropriate service representative manager. The service representative manager evaluates where the escalation can be handled.
- Requests for expedites are received in Leo. They are generally not called in.

#### **Overflow Process**

- In certain instances, an LCSC may experience high volumes and must route orders to another LCSC (From Atlanta to Birmingham and vice versa)
- Different locations assist other in the event of a work overload. (Note this does not happen often)

#### **Training**

## **Regional Testing of Bell South's Operational Support Systems**

**Meeting Minutes – April 9, 2001 AM**

- Re-sale representatives receive 13 weeks of classroom based training. After the classroom training, the new representative works in a "bubble" on the floor for two weeks. This training provides the representative the experience of working with live transactions.
- Representatives are trained on the various order types (UNE, Re-sale, and Complex).
- New representatives are notified of their expectation prior when they start on the floor.

### **Quality Assurance**

- The system tracks accuracy and number of errors daily. Reports are generated weekly (Monday) to summarize this information. The manager reviews the representative's performs according to these reports.
- Managers have on-going coaching meetings to identify on-going consistent errors.
- Managers review the representatives' top five errors weekly.
- Managers work to maintain 70% service order accuracy rating for all their responsible representatives.

ATTACHMENT 10

DECLARATION OF JAY M. BRADBURY

00001

1 BEFORE THE NORTH CAROLINA UTILITIES COMMISSION

2

IN THE MATTER OF:

3

Application of BellSouth

4 Telecommunications, Inc. To

Provide In-Region InterLATA

5 Services Pursuant to Section

271 of the Telecommunications

6 Act of 1996

~~~~~

7

8

DEPOSITION OF

9

RONALD PATE

10

October 10, 2001

11

7:30 a.m.

12

675 West Peachtree Street

Atlanta, Georgia

13

14

Kerry A. McFadden, RPR, CCR B-1878

15

16

17

18

19

20

21

22

23

24

25

00002

1 APPEARANCES OF COUNSEL:

2 On behalf of AT&T:

3 MICHAEL A. HOPKINS, ESQUIRE

4 McKenna & Cueno, L.L.P.

5 1900 K Street, N.W.

6 Washington, D.C. 20006-1108

7 202.496.7835

8

9 On behalf of BellSouth Telecommunications, Inc.:

10 LISA FOSHEE, ESQUIRE

11 BellSouth Telecommunications

12 675 West Peachtree Street

13 Suite 4300

14 Atlanta, Georgia 30342

15 404.355.0754

16

17 On behalf of MCI:

18 KENNARD B. WOODS, ESQUIRE

19 WorldCom, Inc.

20 Concourse Corporate Center Six

21 6 Concourse Parkway, Suite 3200

22 Atlanta, Georgia 30328

23 770.284.5497

24

25

00003

1 Deposition of Ronald Pate

2 October 10, 2001

3 RONALD PATE, being first duly sworn,

4 was examined and deposed as follows:

5 EXAMINATION

6 BY-MR.HOPKINS:

7 Q. Good morning, Mr. Pate.

8 A. Good morning.

9 Q. We're going to do a little bit of  
10 discovery here, OSS. So let's get started I  
11 guess.

12 Just to start off, can you briefly  
13 give me a description of your roles and  
14 responsibilities in your current position?

15 A. Certainly. In my current position,  
16 I'm a director in network and connection  
17 services. And my primary role is to work  
18 within the regulatory community, specifically  
19 around operation support systems, OSS, be the  
20 spokesperson on behalf of the company in the  
21 regulatory community regarding our compliance  
22 around the telecommunications act, as well as  
23 bring back any rulings from any regulatory  
24 commissions for discussion and training with  
25 BellSouth's corporate personnel implementation.

00055

1 Q. Mr. Pate, we were talking about flow  
2 through and the difference in the calculation of  
3 achieved and BellSouth flow, and your calculation  
4 of flow through?

5 A. Yes.

6 Q. Now, the achieved number, would you  
7 agree that that represents the BellSouth's system  
8 capability for flow through for electronic LSRs  
9 submitted?

10 A. I say both of them represent that,  
11 they just represent it in different ways.

12 Q. But from the total electronic LSRs  
13 submitted.

14 A. It takes that into consideration.  
15 By not excluding that, that calculation includes  
16 that. So you're getting one that says out of  
17 everything submitted electronically --

18 Q. -- BellSouth's system are capable of  
19 flowing through on this particular month X  
20 percent --

21 A. That's correct.

22 Q. -- the achieved flow-through number?

23 A. Based on the way it's defined, yes.

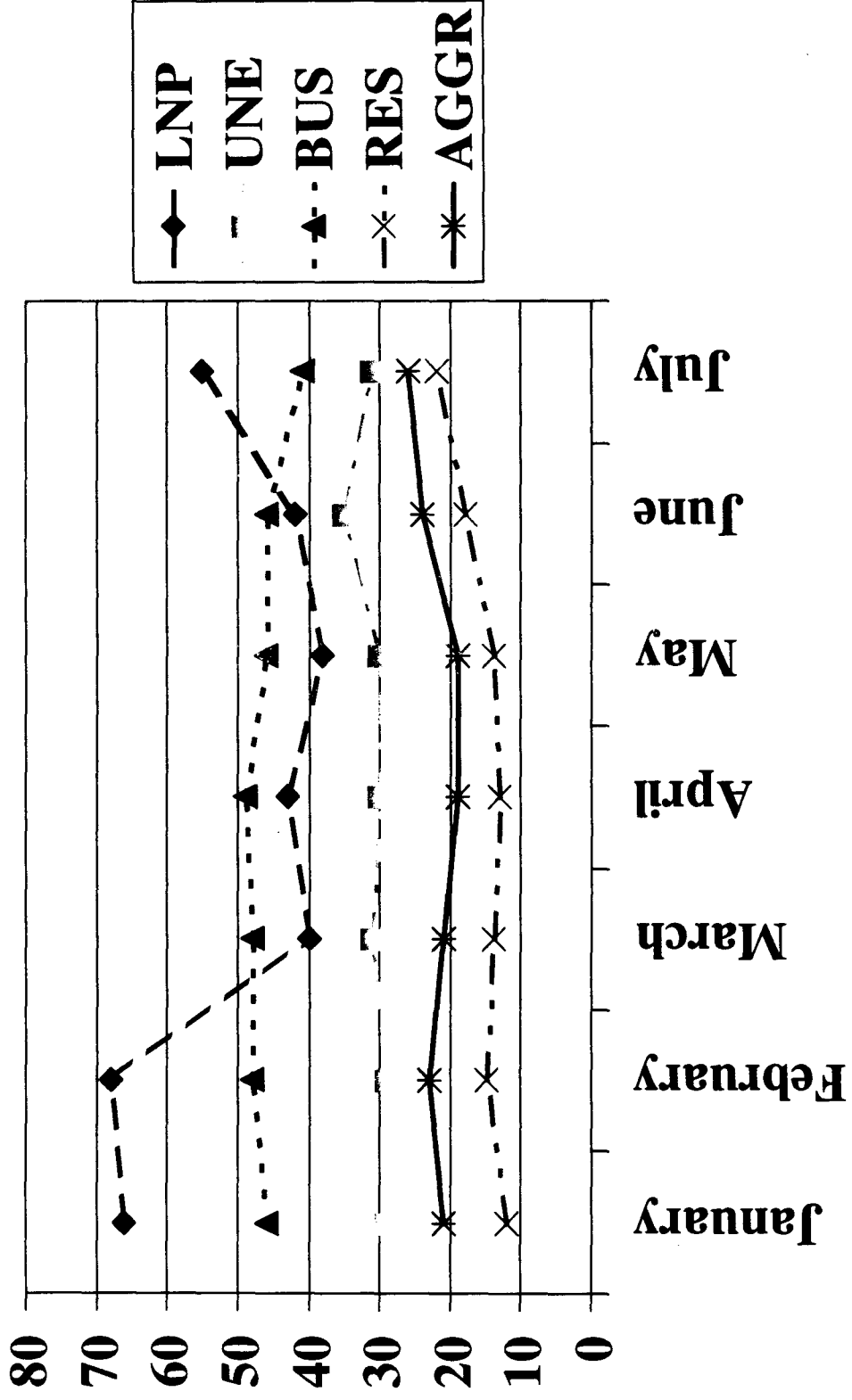
24 Q. Okay. Are you -- I'm sure you are.  
25 You're familiar with Mr. Stacy's affidavit in

ATTACHMENT 11

DECLARATION OF JAY M. BRADBURY



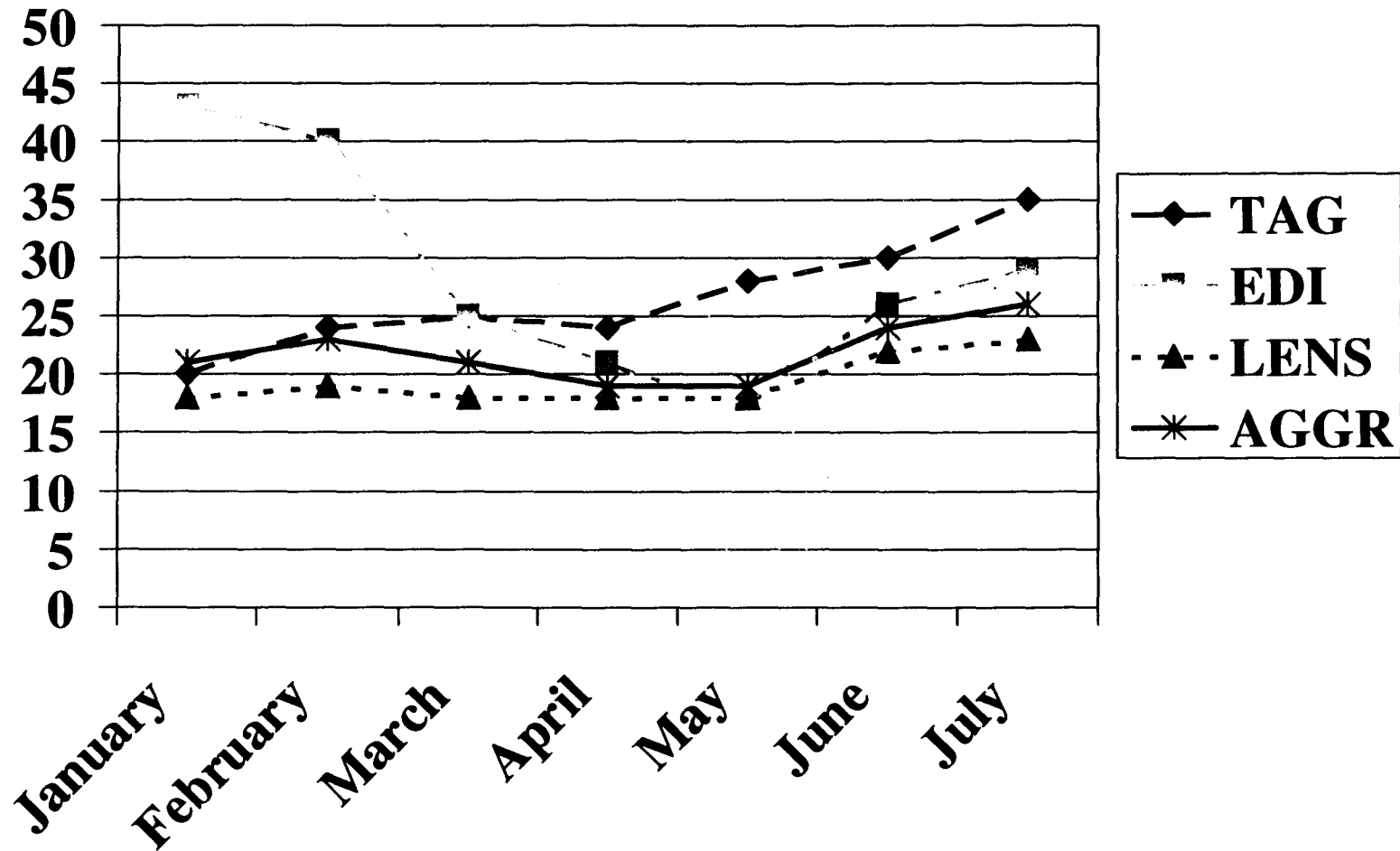
**Percent Total Manual Fallout by Product**



ATTACHMENT 12

DECLARATION OF JAY M. BRADBURY

## Percent Total Manual Fallout by Interface



ATTACHMENT 13

DECLARATION OF JAY M. BRADBURY

BellSouth Telecommunications, Inc.  
North Carolina Utilities Commission  
Docket No. P-55, Sub 1022  
AT&T's 1<sup>st</sup> Interrogatories  
June 25, 2001  
Item No. 103  
Page 1 of 1

**REQUEST:** For the most recent six month period, please provide BellSouth's monthly wholesale revenues (or billings) for each of the following areas: residential resale, business resale, unbundled network elements, and interconnection.

**RESPONSE:**

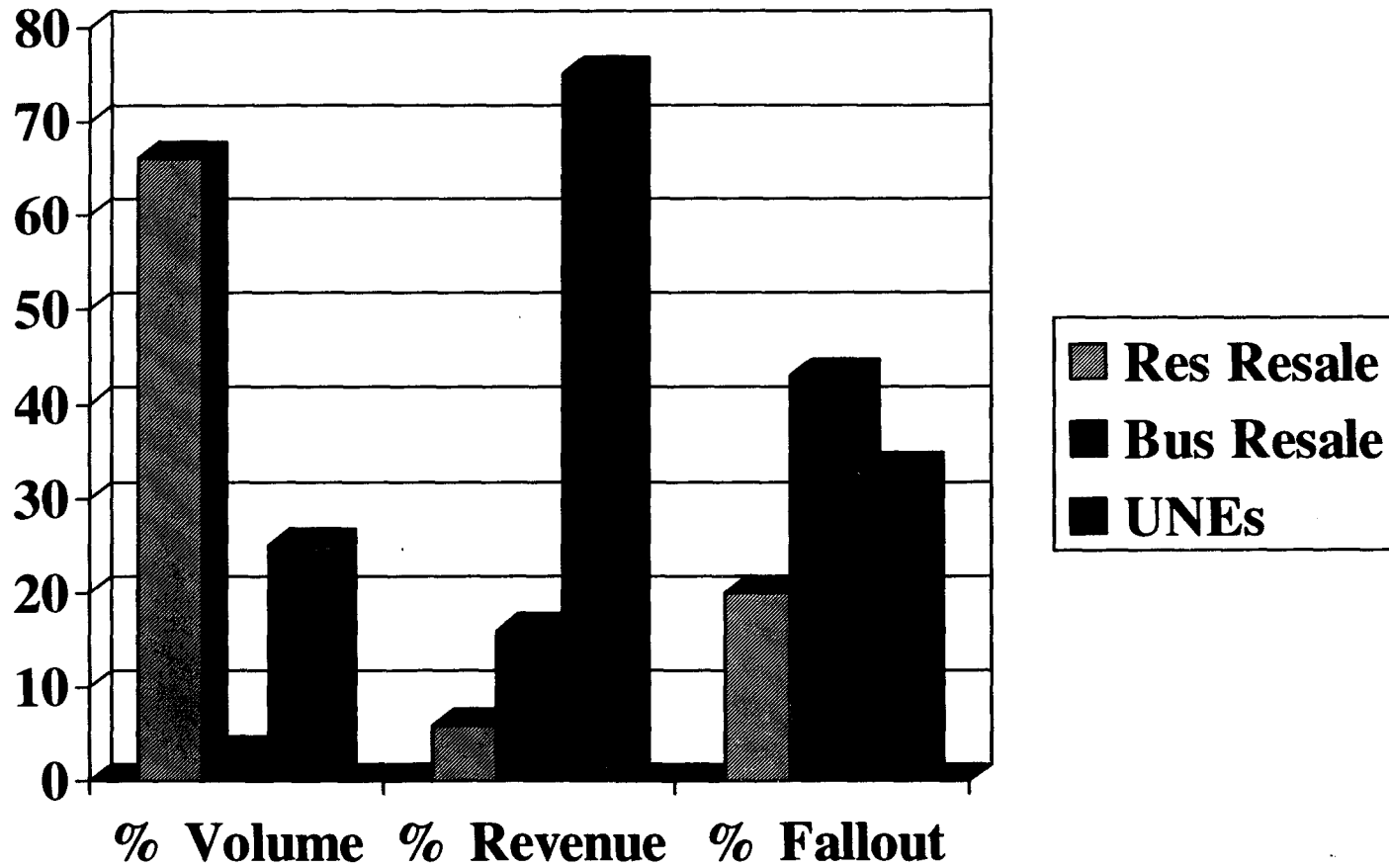
|                       | Dec 00 | Jan 01 | Feb 01 | Mar 01 | Apr 01 | May 01 |
|-----------------------|--------|--------|--------|--------|--------|--------|
| Residential Resale    | 749    | 750    | 763    | 763    | 773    | 744    |
| Business Resale       | 1983   | 2257   | 2322   | 2445   | 2061   | 1958   |
| Total UNE*            | 3019   | 3561   | 3819   | 2668   | 6943   | 9216   |
| Local Interconnection | 406    | 275    | 322    | 225    | 247    | 396    |

\*Total UNE Revenues based on product codes that begin with a 6. This includes revenues associated with Loops, Combos, Local Interconnection, etc.

ATTACHMENT 14

DECLARATION OF JAY M. BRADBURY

## Order Processing Vs Economic Risk



ATTACHMENT 15

DECLARATION OF JAY M. BRADBURY



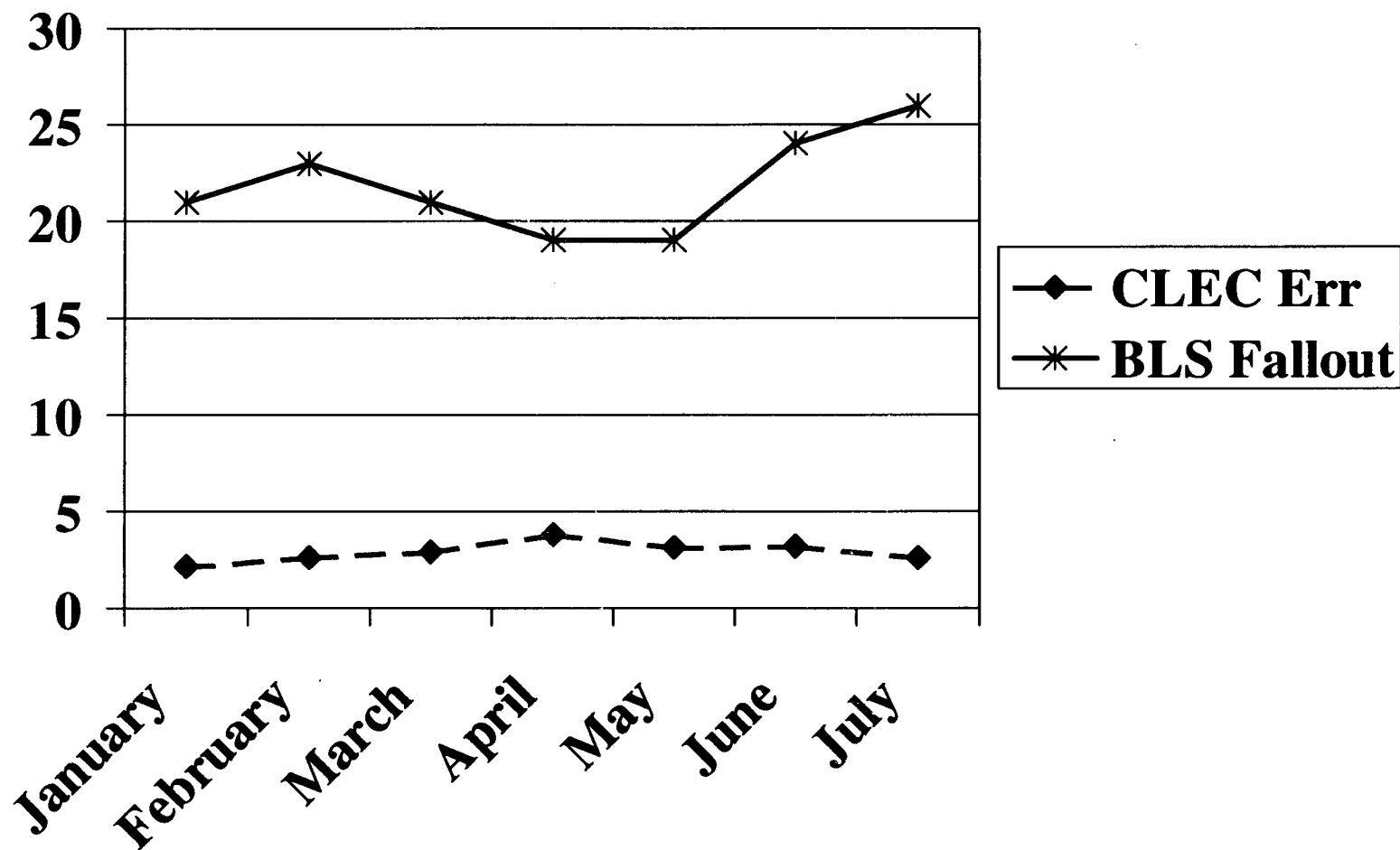
**High fallout rates provide the largest amount of load to  
the LCSC for manual processing**

| <b>BellSouth Ordering OSS</b><br><b>Total Manual Fallout is the Largest Component of LCSC</b><br><b>Volume</b> |                  |                   |                |                |              |               |               |
|----------------------------------------------------------------------------------------------------------------|------------------|-------------------|----------------|----------------|--------------|---------------|---------------|
|                                                                                                                | January,<br>2001 | February,<br>2001 | March,<br>2001 | April,<br>2001 | May,<br>2001 | June,<br>2001 | July,<br>2001 |
| Electronic LSRs                                                                                                | 294,160          | 274,360           | 312,955        | 268,859        | 375,577      | 340,758       | 369,798       |
| Total BLS Fallout                                                                                              | 62,131           | 63,607            | 65,174         | 52,245         | 72,935       | 82,371        | 95,816        |
| % BLS Fallout                                                                                                  | 21%              | 23%               | 21%            | 19%            | 19%          | 24%           | 26%           |
| CLEC Error                                                                                                     | 6,558            | 7,273             | 9,036          | 10,128         | 11,662       | 10,883        | 9,581         |
| % CLEC Error                                                                                                   | 2.2%             | 2.6%              | 2.9%           | 3.8%           | 3.1%         | 3.2%          | 2.6%          |
| Manual LSRs                                                                                                    | 43,170           | 40,128            | 49,095         | 41,337         | 42,118       | 40,499        | 42,126        |
| Total BLS Fallout                                                                                              | 62,131           | 63,607            | 65,174         | 52,245         | 72,935       | 82,371        | 95,816        |
| CLEC Error                                                                                                     | 6,558            | 7,273             | 9,036          | 10,128         | 11,662       | 10,883        | 9,581         |
| TOTAL LCSC                                                                                                     | 111,859          | 111,008           | 123,305        | 103,710        | 126,715      | 133,753       | 147,523       |

ATTACHMENT 16

DECLARATION OF JAY M. BRADBURY

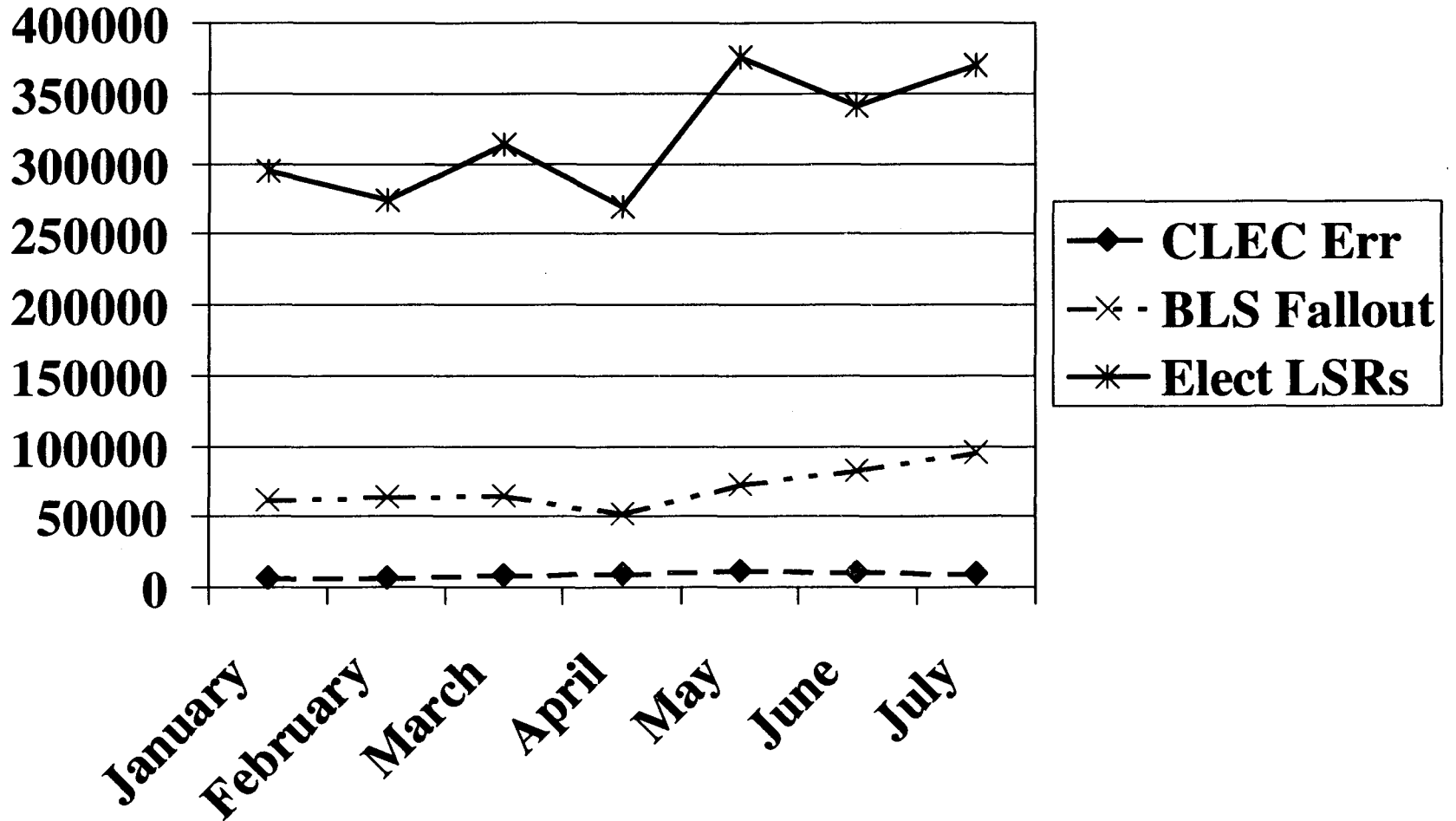
## Percent CLEC Error Vs. Percent Total Manual Fallout



ATTACHMENT 17

DECLARATION OF JAY M. BRADBURY

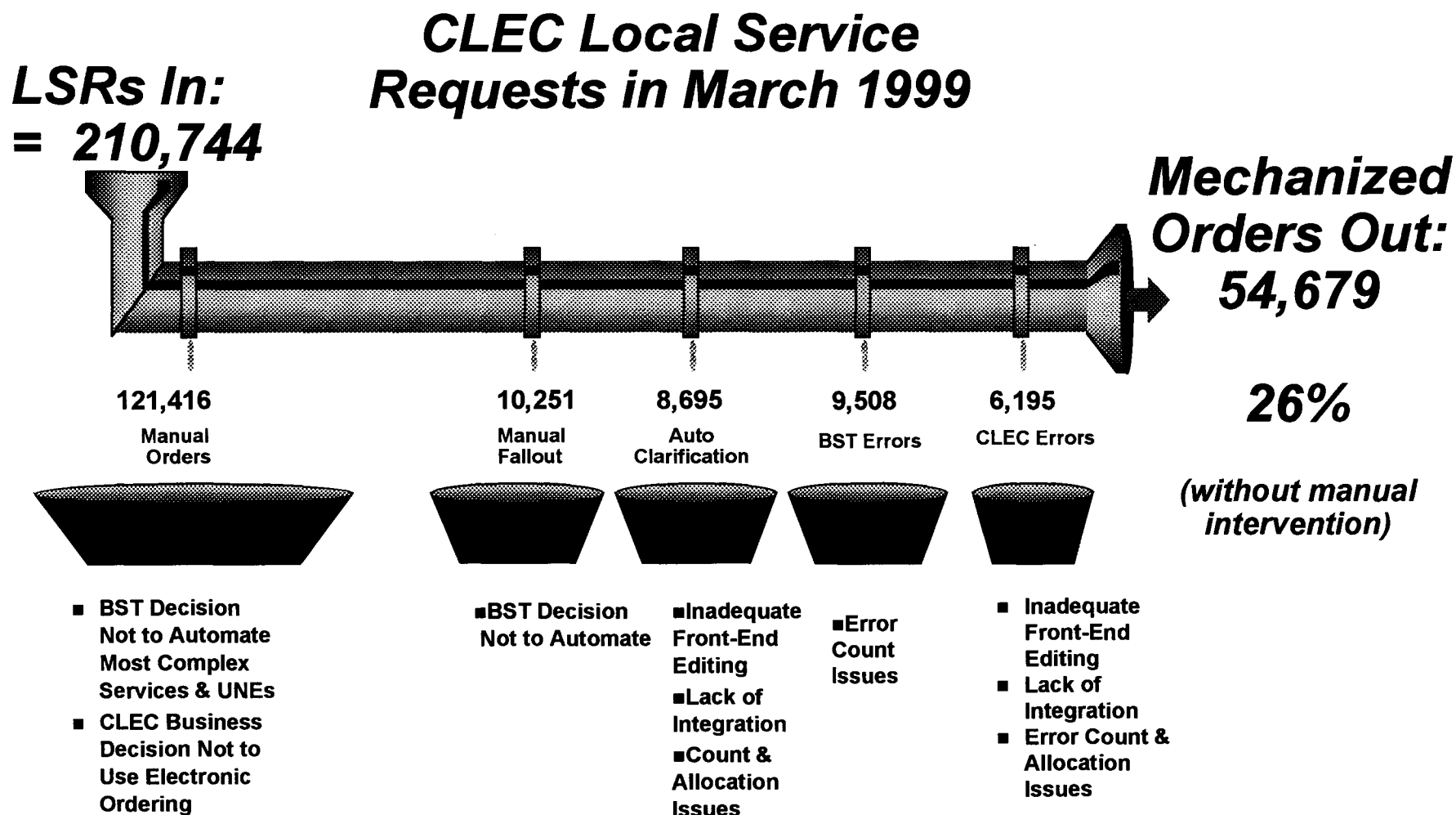
## Electronic LSR Volumes



ATTACHMENT 18

DECLARATION OF JAY M. BRADBURY

# BellSouth Reliance on Manual Order Processing



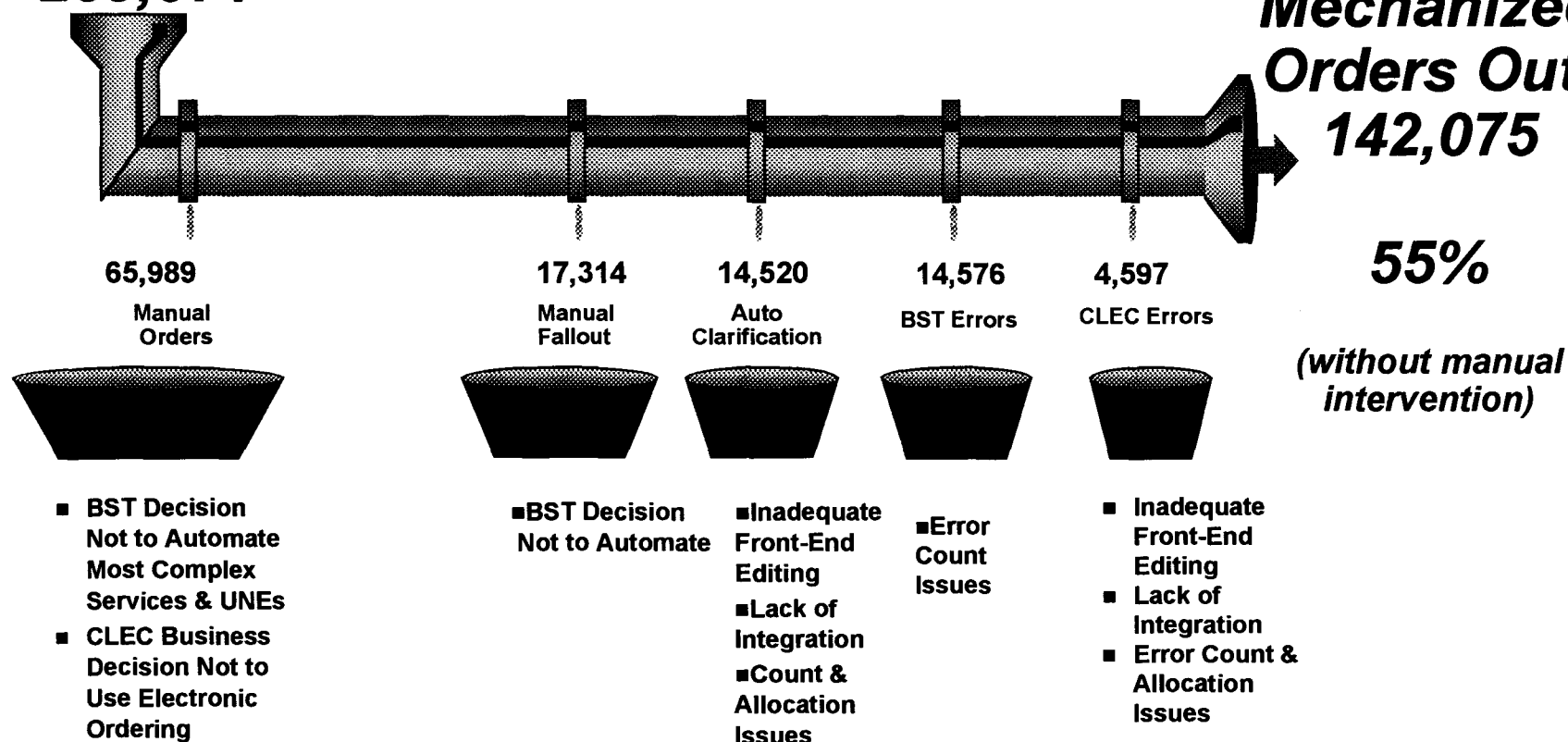
Sources – BellSouth Exhibit OSS-56 and monthly Flow-Through Reports filed with the Georgia PSC

# BellSouth Reliance on Manual Order Processing

## CLEC Local Service Requests in March 2000

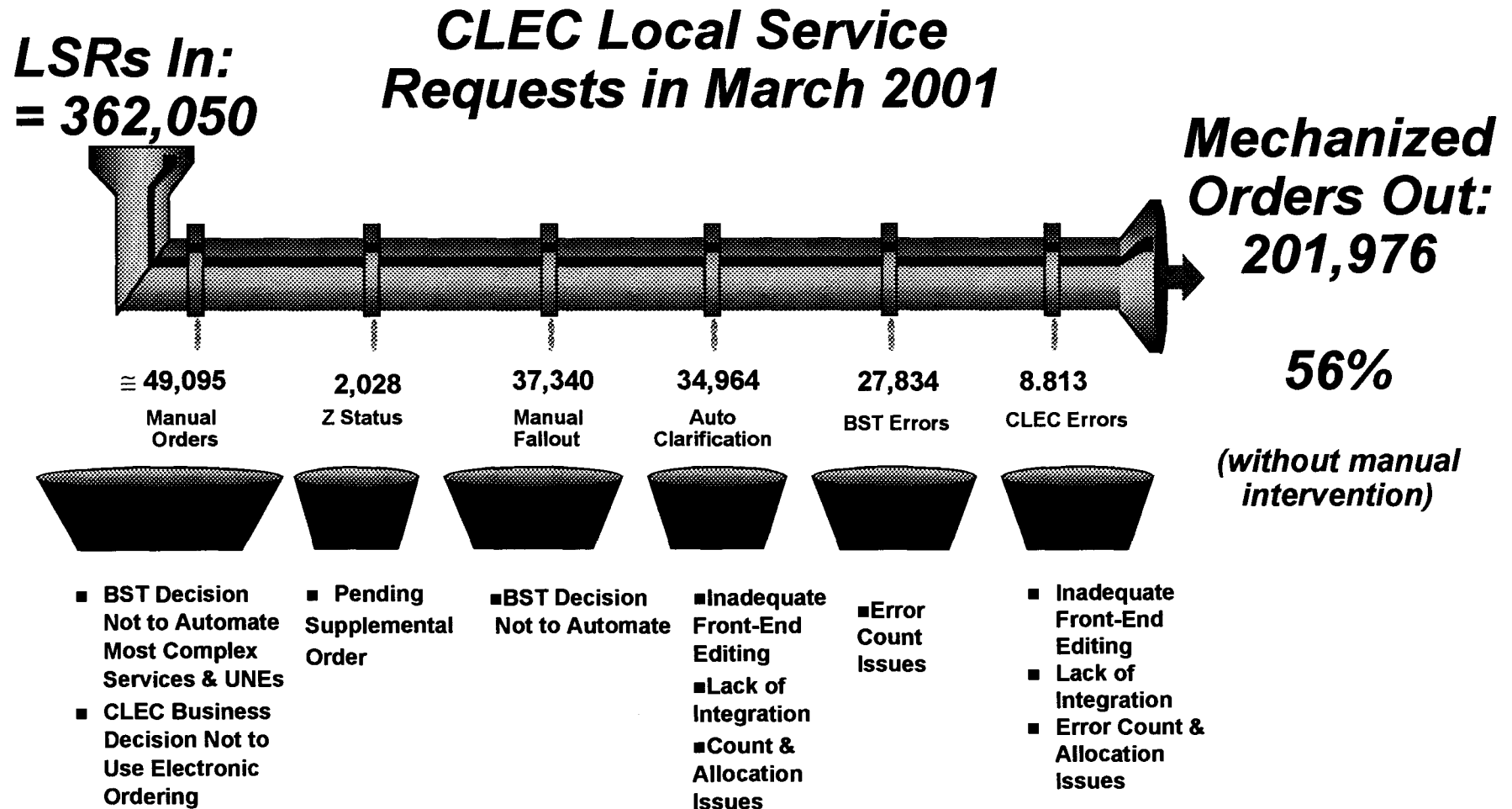
**LSRs In:  
= 259,071**

**Mechanized  
Orders Out:  
142,075**





# BellSouth Reliance on Manual Order Processing



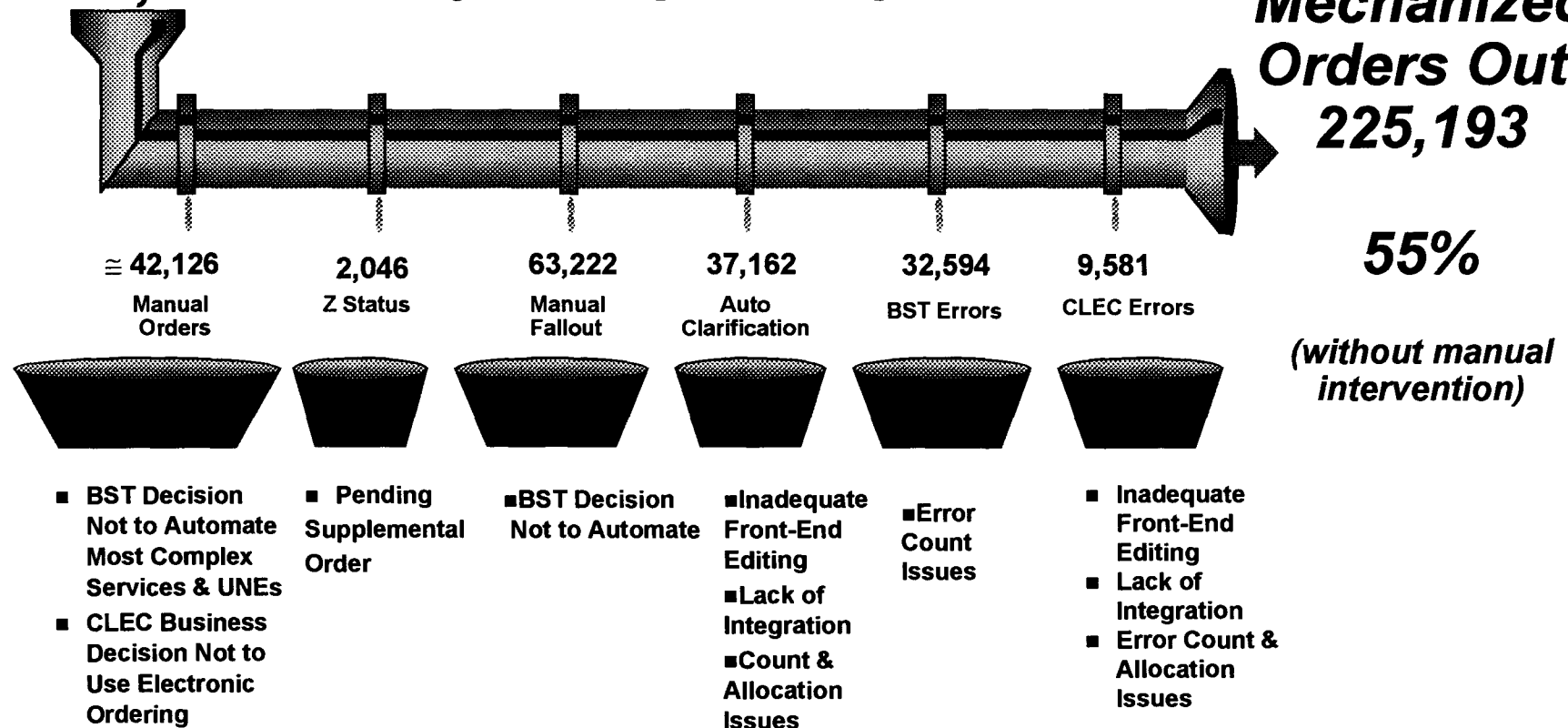
Sources – BellSouth Exhibit OSS-56 and monthly Flow-Through Reports filed with the Georgia PSC

# BellSouth Reliance on Manual Order Processing

*CLEC Local Service  
Requests in July 2001  
per Original Report*

**LSRs In:  
= 411,924**

**Mechanized  
Orders Out:  
225,193**



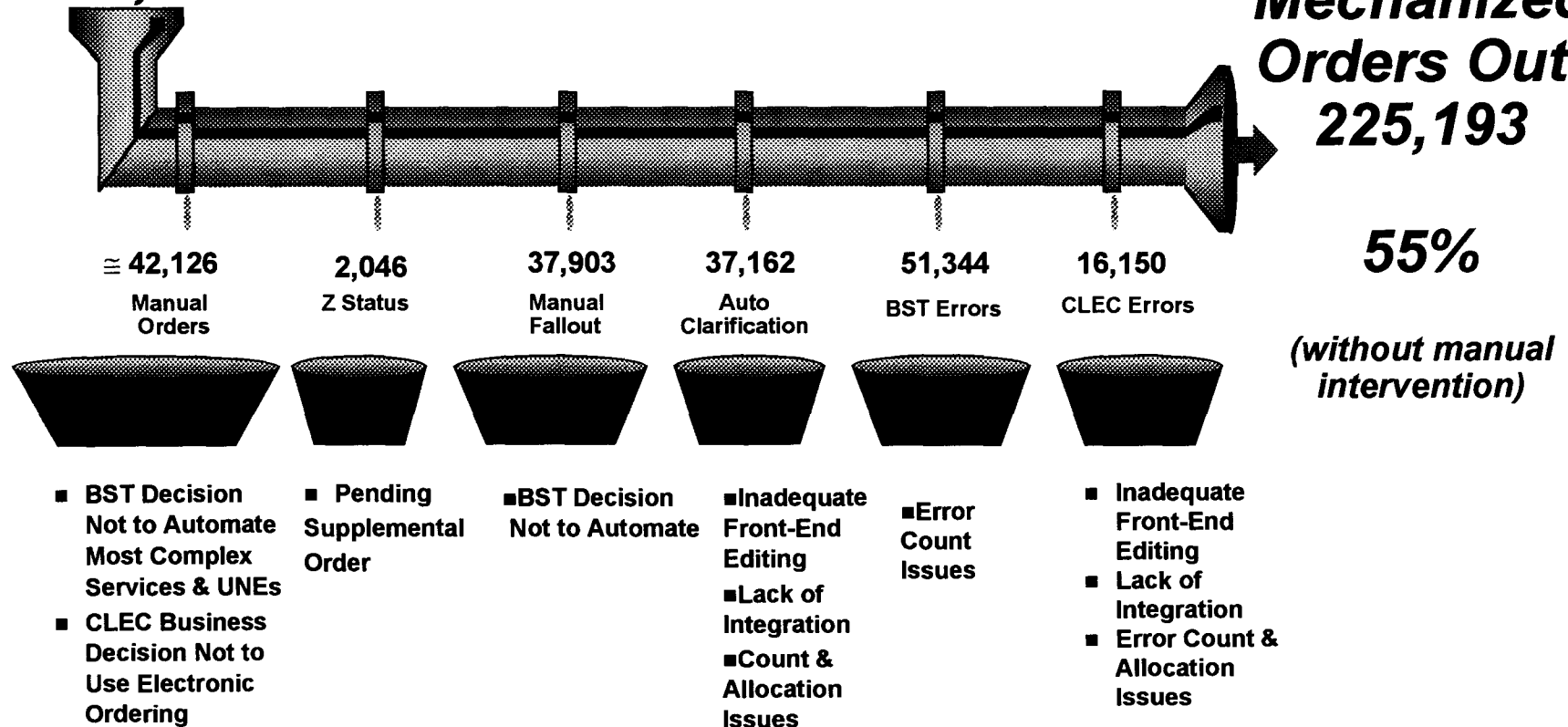
Sources – BellSouth Exhibit OSS-56 and monthly Flow-Through Reports filed with the Georgia PSC

# BellSouth Reliance on Manual Order Processing

**CLEC Local Service  
Requests in July 2001  
per Revised MSS**

**LSRs In:  
= 411,924**

**Mechanized  
Orders Out:  
225,193**

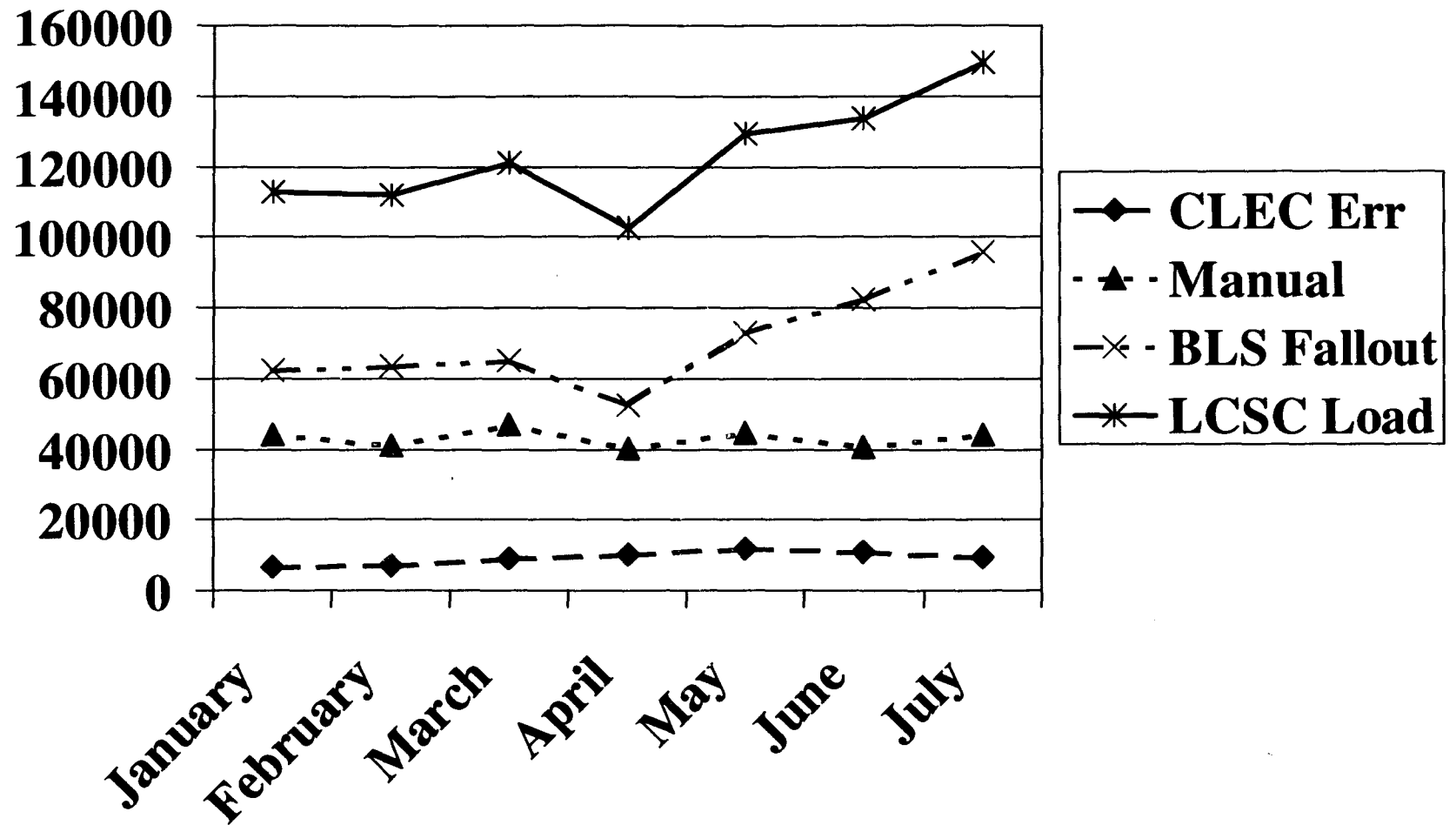


Sources – BellSouth Exhibit OSS-56 and monthly Flow-Through Reports filed with the Georgia PSC

ATTACHMENT 19

DECLARATION OF JAY M. BRADBURY

## LCSC LSR Load Components



ATTACHMENT 20

DECLARATION OF JAY M. BRADBURY

**The timely delivery of partially mechanized rejections  
and firm order confirmations by the LCSC is negatively  
impacted by high fallout rates**

**Answer time on status calls to the LCSC is also negatively  
impacted**

| <b>BellSouth Ordering OSS</b><br>Impacts on reject notices, firm order confirmations and LCSC<br>answer time. |                  |                   |                |                |              |               |               |
|---------------------------------------------------------------------------------------------------------------|------------------|-------------------|----------------|----------------|--------------|---------------|---------------|
|                                                                                                               | January,<br>2001 | February,<br>2001 | March,<br>2001 | April,<br>2001 | May,<br>2001 | June,<br>2001 | July,<br>2001 |
| TOTAL LCSC<br>LOAD                                                                                            | 112,644          | 111,846           | 120,973        | 102,547        | 129,234      | 133,753       | 149,347       |
| Partially Mechanized Rejection Notice Average Interval (hours)                                                |                  |                   |                |                |              |               |               |
| Resale Res*                                                                                                   | 12.3             | 14.4              | 5.0            | 3.0            | 3.7          | 6.6           | 6.3           |
| Resale Bus*                                                                                                   | 14.8             | 19.7              | 4.3            | 2.9            | 2.9          | 5.0           | 5.4           |
| UNE-P*                                                                                                        | 14.1             | 16.3              | 4.1            | 2.1            | 3.7          | 4.4           | 5.0           |
| UNE-L w LNP#                                                                                                  | 36.4             | 30.8              | 33.9           | 27.4           | 7.4          | 12.2          | 8.1           |
| Stand alone LNP#                                                                                              | 14.6             | 22.5              | 17.6           | 28.1           | 4.7          | 9.8           | 5.1           |
| Partially Mechanized Firm Order Confirmation Average Interval (hours)                                         |                  |                   |                |                |              |               |               |
| Resale Res*                                                                                                   | 18.2             | 18.0              | 5.3            | 3.6            | UA           | 7.0           | 7.2           |
| Resale Bus*                                                                                                   | 18.5             | 18.7              | 5.0            | 3.4            | UA           | 6.5           | 6.2           |
| UNE-P*                                                                                                        | 19.7             | 17.3              | 4.3            | 4.3            | UA           | 5.8           | 5.5           |
| UNE-L w LNP#                                                                                                  | 35.7             | 28.1              | 27.2           | 25.4           | 6.5          | 10.0          | 6.1           |
| Stand alone LNP#                                                                                              | 11.8             | 22.9              | 22.6           | 30.0           | 5.3          | 8.2           | 3.4           |
| LCSC Answer Time (seconds)                                                                                    |                  |                   |                |                |              |               |               |
| Answer Time                                                                                                   | 398              | 179               | 148            | 96             | 50           | 65            | 59            |
| Call Volume                                                                                                   | UA               | UA                | 40,869         | 37,961         | 43,526       | 33,796        | 44,292        |
| Retail Analog                                                                                                 | 84               | 42                | 57             | 28             | 27           | 27            | 26            |

\* Conversion to "business hour" basis occurred in March

# Conversion to "business hour" basis and other revisions occurred in May

ATTACHMENT 21

DECLARATION OF JAY M. BRADBURY



**BellSouth-Florida OSS Testing Evaluation  
Status Meeting Minutes  
September 12, 2001**

---

Meeting Location: Conference Call: 712-257-0245 Pass code: 86140#

Time: 10:00 AM

| Meeting Attendees                                                                                                                                                                                                              | Organization      |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|
| Rhonda Merritt<br>Rich Bobik                                                                                                                                                                                                   | AT&T              |
| Sherri Lichtenberg<br>Donna McNulty                                                                                                                                                                                            | MCI WorldCom      |
| Vicki Kaufman                                                                                                                                                                                                                  | FCCA              |
| Colette Davis                                                                                                                                                                                                                  | Covad             |
| Mary Conquest                                                                                                                                                                                                                  | ITC DeltaCom      |
| Kyle Kopytchak                                                                                                                                                                                                                 | Network Telephone |
| Kathy Wilson-Chu<br>Clayton Lindsey<br>Milton McElroy                                                                                                                                                                          | BellSouth         |
| Adina Brownstein<br>Linda Gray<br>Jon Gena<br>Wes Perkowski<br>Mary Beth Keane<br>Jeff Johnson<br>Bill Wahl<br>Graham Watkins<br>Jeff Goldstein<br>Jack Sheehan<br>John Cacopardo<br>Juliet Ntabgoba<br>Jim Woods<br>Ron Fuchs | KPMG Consulting   |
| Lisa Harvey<br>Carl Vinson<br>Jerry Hallenstein<br>John Duffey<br>Mary Ann Kelley<br>Rodney Wallace                                                                                                                            | FPSC              |

**BellSouth-Florida OSS Testing Evaluation  
Status Meeting Minutes  
September 12, 2001**

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**Meeting Summary:**

Old Business:

**BellSouth** DUF Return Process update: BellSouth has no formal DUF return process or policy. BellSouth does have two alternatives in place for CLEC use. CLECs experiencing DUF data or process issues can initiate the Billing Support Dispute Process or call the Billing Support line.

**MCI WorldCom** We have over 60,000 DUF records to return. We have contacted the Billing Group and spent many hours on the phone trying to reach a resolution. To date, MCI WorldCom's concerns regarding incorrect DUF records have not been adequately addressed by BellSouth.

**BellSouth** We would like to schedule an offline call with MCI WorldCom to further investigate this issue.

**AT&T** Will this be a public call?

**MCIWorldCom** We have no problem with the call being open to the CLEC community.

**BellSouth** We will schedule a call and make the number available for additional CLEC participation.

**KPMG Consulting** Covad Communication has experienced issues with utilizing a single point of contact at the LCSC and asked KPMG Consulting to discuss their experience. KPMG Consulting has identified the BellSouth documented process for contacting the LCSC. This process involves dialing a 800 number to speak with a BellSouth representative in the CRSG. When the CRSG responds, the response includes a contact name and number. KPMG Consulting has experienced deviations from the documented BellSouth process but is not ready to comment on the impact of these events.

**MCIWorldCom** What is the CRSG?

**KPMG Consulting** BellSouth's Complex Resale Support Group.

**Network Telephone** When we call the LCSC, as opposed to the CRSG, our calls are directed to the first available BellSouth service representative. This does differ from some CLEC reported experiences. We deal with the CRSG and the LCSC and their processes here are extremely different. When we contact the LCSC directly, instead of starting with the CRSG, we find that service representatives and supervisors seem to have inadequate and conflicting information.

**KPMG Consulting** In some instances, KPMG Consulting has experienced cases where we are able to call into the LCSC and the first available service representatives are able to address our issues, in the case where we are unable to obtain resolution or the LCSC does not follow the standard process, we will be reporting our findings as we experience..

**Network Telephone** Call back times from the LCSC often run into hours and there is no consistency.

**BellSouth-Florida OSS Testing Evaluation  
Status Meeting Minutes  
September 12, 2001**

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**KPMG Consulting** Our test includes evaluation criteria which addresses BellSouth response time.

**AT&T** What is the resolution on this issue?

**KPMG Consulting** We will continue our evaluation and report on our findings. Our final report will reflect our experience as a test CLEC. KPMG Consulting is investigating all related BellSouth processes, as well as instances where the processes were not followed.

**MCI WorldCom** When you call into the LCSC, do your phone lines identify you as KPMG Consulting? What do you do to make sure you do not receive preferential treatment?

**KPMG Consulting** The LCSC representatives ask for our identifying numbers. To make sure that we do not receive preferential treatment, we mix the pool of people making calls to BellSouth, we use different company codes, we make calls from multiple locations, and we also call at varying times.

#### **Update of Specific Billing Infrastructure**

##### **What are we planning to change?**

- Portions of the applications used to bill CLECs for unbundled switch ports, port / loop combinations (including UNE-P) and unbundled loops (Service Level 1 loops only):
- The rating application that we use today to calculate usage and monthly charges that BellSouth bills CLEC customers The rating application that we use today to calculate usage and monthly charges that we to our CLEC customers
- Our bill formatting application/tool
- Screens and tools used by our Service Reps to log, track and manage adjustments and disputes for CLECs

##### **What processes continue, i.e., what is NOT changing?**

- Daily Usage File (DUF) processes for delivering UNE usage to the CLECs
- Delivery of industry-developed bill formats for UNE products (type "J" and "N" bills)
- Delivery of "bill day" CSR data
- Delivery of bill and CSR data electronically

##### **Why are we upgrading these billing applications?**

- To ensure that we have the infrastructure in place to support future CLEC customers and their usage volumes – a growing issue as CLECs serve more of the market place via UNE-P

**BellSouth-Florida OSS Testing Evaluation  
Status Meeting Minutes  
September 12, 2001**

- 
- To have more table driven flexibility for ourselves such that we can add new UNE products, price plans and customer specific contracts – faster and more efficiently
  - To have more flexibility in implementing bill format changes that may be decided upon in the industry – such that implementation is faster and at less cost
  - To provide better tools for our Service Reps such that they can better respond to and support the CLECs

**What will the impact be to the CLECs themselves?**

- Only a few minor items identified thus far that **may** be visible to the CLECs
  1. An invoice number will be included on our bills that will help our customers and ourselves better track and manage payments, disputes and adjustments.
  2. A minor modification will be made on the remittance document to accommodate invoice billing.
  3. Usage quantities will not be provided on the adjustment records for usage adjustments.
  4. One OC&C per month will be produced for Retroactive Rate Changes that span more than one month.
- All bills and data tapes will continue to be CBOS compliant. No changes will occur in field lengths or record lengths; no new fields will be added.

**When will we implement?**

Undetermined at this point; will depend on final solution and testing schedule. CLECs will be provided with notice 30 days prior to implementation.

**MCI WorldCom** What internal testing will you do for the release?

**BellSouth** At present, we are conducting internal testing, including system integration. The Service Order process will not change. The CSR data will not change. BellSouth is testing with data from multiple states to integrate Ordering and Billing to ensure that there are no CLEC impacting changes. BellSouth is producing and comparing actual bills as a part of this testing.

**MCI WorldCom** Are you comparing current incorrect billing with the new upgrades?

**BellSouth** We are working to correct incorrect Billing data in our legacy systems.

**MCI WorldCom** Will the new software help BellSouth clear Hold File errors?

**BellSouth** No, there will be no Service Order process changes. For UNE-P Billing Combos, BellSouth is upgrading the existing tables and applications allowing the bills to be formatted. Changes in each bill will include the addition

**BellSouth-Florida OSS Testing Evaluation  
Status Meeting Minutes  
September 12, 2001**

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of an invoice number in the BET file and this number will be retained by BellSouth's systems to aid CLEC and BellSouth tracking. Use of this invoice number will be optional to CLECs.

**MCI WorldCom** MCI WorldCom requests that we have further discussion on this, perhaps BellSouth would consider holding a Billing forum.

**BellSouth** We will take that suggestion under consideration.

**AT&T** Earlier, four changes to the Billing system were mentioned. We have not covered all of them.

**BellSouth** The four changes include the following:

- The ability to log and manage billing data with BellSouth generated invoice numbers
- The inclusion of a remittance document, adding the invoice number
- Adjusting the amount of space a BellSouth representative has to log messages /changes to a record
- Adding a feature to calculate retroactive rate changes across calendar months and billing periods as a single entry, instead of having multiple entries on the same record.

**Network Telephone** How were these changes identified?

**BellSouth** They were identified internally.

**Network Telephone** The source of the changes is BellSouth? Will these changes impact your IT department and your back office interfaces?

**BellSouth** We have identified the changes, that is correct. However, the same outputs will be observed by CLECs.

**Network Telephone** When were these changes identified?

**BellSouth** They were identified as a part of our on-going business and to meet new business and regulatory requirements.

**Network Telephone** What part of the Change Control Process did this go through?

**BellSouth** This was not included as a part of the Change Control Process. These are backend components of the BellSouth Billing system. We have yet to determine an implementation date, therefore these changes have not been introduced as a part of the formal Change Control Process.

**MCI WorldCom** When would these changes go to the Change Control Process?

**BellSouth** At least 30 days prior to implementation.

**Network Telephone** In effect, BellSouth identified items it wanted to address and these were not included in the Change Control prioritization list.

**Covad** These large, CLEC impacting changes should go through the Change Control Process and be prioritized.

**BellSouth** There are no proposed changes that are not fully compliant with CBOS standards.

**BellSouth-Florida OSS Testing Evaluation  
Status Meeting Minutes  
September 12, 2001**

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**KPMG Consulting** A question was raised on a previous call regarding how KPMG Consulting is connecting to EDI. KPMG Consulting uses a product called "Direct Connect" and has a T-1 line directly to BellSouth.

**MCI WorldCom** KPMG Consulting had an Exception pertaining to missing notifiers. What is the status?

**KPMG Consulting** The issues surrounding this Exception are still being investigated.

1) Project Management

- **Adina Brownstein (KPMG Consulting)**

Project Plans and Monthly reports are being finalized and should be out early next week.

2) Lead Updates

- **CLEC Relations: Adina Brownstein (KPMG Consulting)**

- Observations to be discussed this week include Observations 74, 77, 89, 90, 113, and 116. KPMG Consulting will be introducing Observations 117 and 118. KPMG Consulting will be closing Observation 110.
- Exceptions to be discussed this week include Exceptions 43, 44, 45, 54, 57, 60, 62, 63, 64, 67, 80, 86, 94, 96, 101, and 107. KPMG Consulting will be introducing Exception 109. KPMG Consulting will also be closing Exceptions 11 and 78.
- The next CLEC Face to Face will occur in Tallahassee, Florida on October 10<sup>th</sup> – details to be sent out. Please forward agenda suggestions to Adina Brownstein or Lisa Harvey.

- **RMI: Graham Watkins and Bill Wahl (KPMG Consulting)**

- KPMG Consulting continues to monitor the Change Control Process and is preparing a retest related to Exception 12 for PPR1.
- KPMG Consulting is continuing to review documentation and preparing a disposition statement for Exception 65 as a part of PPR2.
- KPMG Consulting continues the PPR3 review of the ECS help desk logs.
- KPMG Consulting has no scheduled activity for PPR4.  
KPMG Consulting is reviewing BellSouth interface development process documentation and monitoring the development of the BellSouth CLEC test environment (CAVE) and the BellSouth Release Management process for PPR5.

**MCI WorldCom** The date for CAVE unavailability seems to have changed. We have not seen any formal notification of CAVE outages.

**BellSouth** A notice was sent out via the Change Control Process.

**MCI WorldCom** That notice was a response to an MCI WorldCom question. Will anything more formal be posted?

**BellSouth-Florida OSS Testing Evaluation  
Status Meeting Minutes  
September 12, 2001**

- 
- **BellSouth** We are not sure if that notice was directed toward MCI WorldCom or toward the all members of the Change Control Process distribution list.
  - **Metrics: Linda Gray (KPMG Consulting)**
    - KPMG Consulting requested additional information from BellSouth and continues to analyze documentation regarding PMR1
    - KPMG Consulting began the Month III review and completed BellSouth interview summaries for PMR2.
    - KPMG Consulting reviewed and accepted BellSouth's response to RDUM interview summaries as a part of PMR3.
    - PMR4 Activity – KPMG Consulting completed analysis of data related to project codes.

|              | KPMG Consulting Activity                             |
|--------------|------------------------------------------------------|
| Test CLEC    | Complete KPMG Consulting test CLEC process check.    |
| Provisioning | Continue testing Barney snapshots to NODS            |
| Billing      | Continuing testing legacy to Barney Snapshots.       |
| M&R          | Start Exact integrity test and data request process. |

- KPMG Consulting is continuing re-testing based on observations and exceptions. KPMG Consulting planned to work on 7 and worked on 10 metrics – 5 matched, 2 replicated but not matched, and 3 in progress. Overall status for PMR 5, Month I –94% initial pass completed, 85% Match; Month II – 70% Initial pass completed, 65% Match; Month III –39% initial pass completed; 39% match. (NOTE: The match rate is based upon total metrics to be tested, not just what has been replicated.) This week KPMG Consulting plans to work on 7 Metrics.
  - **Billing: Jon Gena and John Cacopardo (KPMG Consulting)**
    - KPMG Consulting is continuing preparation for a DUF retest for TVV10.
    - KPMG Consulting has validated 94% of test cases for Bill Period 2 and is continuing to analyze test results for TVV11.
    - KPMG Consulting is continuing to prepare parity evaluation report for PPR10.
    - KPMG Consulting has no planned activity for PPR12.
    - KPMG Consulting has no planned activity for PPR13.
- MCI WorldCom** Is KPMG Consulting aware of the Billing Hold File?  
**KPMG Consulting** Yes, it is addressed in Exception 44 and is still being investigated.
- MCI WorldCom** Is KPMG Consulting looking at how/when BellSouth updates the CNAM database for migration customers with UNE-P?

**BellSouth-Florida OSS Testing Evaluation  
Status Meeting Minutes  
September 12, 2001**

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**Network Telephone** In a response to a clarification, it was questioned if CLECs were using the correct CSR. Are their multiple CSRs which CLECs can access?

**KPMG Consulting** CSRs are updated within a few days after provisioning is complete. This normally means a time lag of two or three days for the changes to be reflected in the billing systems which is where the data is pulled for the CSR. If a CLEC pulls a CSR during this period, it will reflect the old information.

**MCI WorldCom** Are you checking line loss reporting? If so, in what method are you receiving these reports.

**KPMG Consulting** We will provide this information to you next week.

**Network Telephone** BellSouth can't work some of our orders because the CSR isn't updated.

**KPMG Consulting** The time delay in updating the CSR is part of BellSouth standard procedure, we don't consider in our evaluation of validation of the CSR. We validate CSR accuracy and if the CSR is updated accurately as compared to the LSR as a part of our evaluation.

**Network Telephone** Are you noticing any problems with the hunting feature?

**KPMG Consulting** We do evaluate lines with hunting as part of our analysis and if we found issues with products and services including hunting we would list the issue our findings in an Exception.

**Network Telephone** We are tracking this issue and will communicate our findings with KPMG Consulting.

**- Repair, Provisioning & Maintenance (RPM): Wes Perkowski (KPMG Consulting):**

KPMG Consulting is continuing validation testing of switch translations, CSRs, Intercept messaging Completion Notices and Directory Listing. Loop Qualification, Dark Fiber and Line Splitting testing continues. KPMG Consulting is also preparing to retest Intercept Messaging in relation to Observation 76 as a part of TVV4.

KPMG Consulting's final report for TVV5 is in peer review.

KPMG Consulting is preparing a retest of the MLT process for TVV6.

KPMG Consulting is preparing draft of final report for TVV7.

KPMG Consulting is preparing for retesting of volume for TVV8.

KPMG Consulting is preparing draft of final report for TVV9.

KPMG Consulting is continuing to work with CLECs on collocation process and continue testing of OLNS for PPR6.

KPMG Consulting is preparing the draft of final report for PPR9.

KPMG Consulting is working on internal draft of final report for PPR14.

KPMG Consulting is preparing the draft final report for PPR15.



**BellSouth-Florida OSS Testing Evaluation  
Status Meeting Minutes  
September 12, 2001**

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KPMG Consulting has completed the draft final report and submitted it to the Final Report team for PPR16.

**- Order Management: Mary Beth Keane and Jeff Goldstein (KPMG Consulting)**

KPMG Consulting has completed the following for each interface:  
TVV1:

| Number of Orders | EDI | TAG | RoboTAG | LENS | Manual |
|------------------|-----|-----|---------|------|--------|
| Submitted        | 98% | 99% | 57%     | 88%  | 62%    |
| FOC'd            | 92% | 97% | 52%     | 86%  | 53%    |
| CN'd             | 86% | 84% | 49%     | 79%  | 43%    |

- KPMG Consulting is conducting functionality testing for Manual and LENS, and EDI and continues to prepare for retest activities related to TVV1.
- KPMG Consulting is finalizing the detailed analyzing results of the 8/28 manual volume retest for TVV2.
- KPMG Consulting is continuing analysis of weekly LSR and LNP flow through reports, comparing against documentation and is monitoring flow-through performance against benchmarks and assembling the work papers for TVV3.
- KPMG Consulting continues to monitor TVV1 test issues for PPR7.
- KPMG Consulting continued to prepare for a retest for PPR8.

**MCI WorldCom** We continue to have difficulty determining what is and what is not a Flow-Through order. Does KPMG Consulting disclose items that it identifies that do not Flow Through but were never identified as Non-Flow Through by BellSouth?

**KPMG Consulting** Yes, we analyze the expected –vs.-actual Flow Through situation as described and report our findings in Exceptions and Observations. The Flow Through Matrix doesn't offer a comprehensive list of what does and does not Flow Through. Is this what you are referring to?

**MCI WorldCom** Yes, currently, we are experiencing a situation where every retail migration order that has voice mail drops to manual and the BellSouth representatives can not adjust the D order.

**BellSouth** We aren't aware of the issue you describe. We will investigate.

**3. New business:**

There was no new business.

ATTACHMENT 22

DECLARATION OF JAY M. BRADBURY

BellSouth Telecommunications, Inc.  
North Carolina Utilities Commission  
Docket No. P-55, Sub 1022  
AT&T's 1<sup>st</sup> Interrogatories  
June 25, 2001  
Item No. 70  
ATTACHMENT

| Interrogatory No. 70<br>Designed Manual Fallout<br>Distribution (March, April, May<br>2001) | March<br>2001 | April<br>2001 | May<br>2001  | Reason for Fal                       |
|---------------------------------------------------------------------------------------------|---------------|---------------|--------------|--------------------------------------|
| Complex                                                                                     | 10744         | 11789         | 14384        | Technically not possible             |
| Expedite Requested By CLEC                                                                  | 251           | 224           | 263          | Technically not possible             |
| Special Pricing Plan                                                                        | 1583          | 1083          | 1370         | Technically not possible             |
| Denial/Restore Conversion &<br>Disconnect                                                   | 5554          | 2969          | 4320         | Technical limita<br>- trying to mech |
| Some Partial Migration                                                                      | 8             | 12            | 5            | Low volume/No demand                 |
| Class of Service Invalid                                                                    | 0             | 0             | 0            | Technically not possible             |
| New Telephone Number                                                                        | 0             | 0             | 0            | Technically not possible             |
| Low Activity Volume                                                                         | 0             | 0             | 0            | Cost to program doesn't match b      |
| Pending Order                                                                               | 11765         | 6161          | 8565         | Technically not possible             |
| LSRs with > 25 lines                                                                        | 66            | 79            | 71           | Technical limita<br>of system        |
| Transfer of Calls Option                                                                    | 0             | 0             | 0            | Technical Limita                     |
| Inaccurate CSR                                                                              | 366           | 307           | 435          | Technically not possible             |
| Directory Listings                                                                          | 587           | 532           | 692          | Technically not possible             |
| <b>Total</b>                                                                                | <b>30924</b>  | <b>23156</b>  | <b>30105</b> |                                      |
| <b>Flow Through Report Total</b>                                                            | <b>30371</b>  | <b>22788</b>  | <b>29195</b> |                                      |
|                                                                                             |               |               |              |                                      |

ATTACHMENT 23

DECLARATION OF JAY M. BRADBURY

BellSouth Telecommunications, Inc.  
North Carolina Utilities Commission  
Docket No. P-55, Sub 1022  
AT&T's 1<sup>st</sup> Interrogatories  
June 25, 2001  
Item No. 104  
Page 1 of 1

**REQUEST:** Has BellSouth conducted any cost/benefit analysis related to increasing the level of mechanized ordering capability for any resale service, UNE, requisition, activity, or circumstance service, that currently can only be ordered by CLPs on a manual or partially mechanized basis. If so, please provided such cost/benefit analyses.

**RESPONSE:** No.

ATTACHMENT 24

DECLARATION OF JAY M. BRADBURY

## **1.0 Document Objective**

In this document, KPMG Consulting, Inc. (KPMG Consulting) provides an interim status report on developments related to the BellSouth-GA OSS Test Master Test Plan (MTP) and Supplemental Test Plan (STP) final reports. An update of the status of test criteria for which testing was not complete as of the final report, but now is complete, is provided in section 2.0. An update of the status of open issues within Exceptions is summarized in section 3.0.

## **2.0 Updates to MTP and STP final reports**

Since issuing the MTP and STP final reports on March 20, 2001, KPMG Consulting has continued its evaluation of all test criteria listed as “Not Complete” at that time. The following test cross references were listed as “Not Complete” in March, but are now “Satisfied.”

- **O&P 7-6-3 - Average Jeopardy Notice Interval and Percent of Orders Given Jeopardy Notices** – At the time of issue of the MTP final report, KPMG Consulting was unable to match the BellSouth-reported completion date to the KPMG Consulting-recorded completion date for a single Purchase Order Number (PON)/Service Order in October 2000.

BellSouth addressed this discrepancy by indicating that the completion date in KPMG Consulting’s records was correct, and had been incorrectly excluded from BellSouth’s records. BellSouth instituted a system fix to ensure that this would not reoccur in future months.

KPMG Consulting retested this criterion using both KPMG Consulting collected data and BellSouth reported data for November 2000 through February 2001. We found that all of the KPMG Consulting collected data matched the corresponding BellSouth provided data. See the Closure Report for Exception 128 for additional information on this issue.

- **PMR 2-2-3 – Pre-Ordering – OSS Interface Availability** – At the time the MTP final report was issued, KPMG Consulting found evidence of outages not being reflected in the OSS Interface Availability measurement. These outages, found on BellSouth’s change control web site, fully met BellSouth’s definition of outages that should reduce the measured availability (i.e., they were both full and unscheduled).

BellSouth instituted new processes by which all relevant outages (including those listed on its change control Web site) will be taken into consideration when calculating the SQM values. Further, BellSouth updated the SQM documentation to clarify its position on the definition of full outages.

KPMG Consulting confirmed both the presence and completeness of these new

processes, as well as the appropriateness of the new wording in BellSouth's updated SQM manual, in February 2001. See the Closure Report for Exception 133 for additional information on this issue.

- PMR 2-2-4 - *Pre-Ordering – OSS Interface Availability* – See PMR 2-2-3 above
- PMR 2-21-3 – *Maintenance & Repair – OSS Interface Availability* – See PMR 2-2-3 above
- PMR 2-21-4 *Maintenance & Repair – OSS Interface Availability* – See PMR 2-2-3 above
- PMR 4-3-1 - *Ordering – Percent Rejected Service Requests* – At the time the STP final report was issued, KPMG Consulting could not match one early stage value to the corresponding raw data value for each of the LON and LEO systems, using October 2000 data.

For the LEO record, the early stage data showed that a FOC had been sent, but the BellSouth raw data reported a reject interval. This PON was erroneously placed in auto clarification by LESOG. A change request was implemented to correct the cause of this erroneous auto clarification such that the Local Service Request (LSR) was processed, and the PON was subsequently FOC'd.

For the LON record, the early stage data validated the rejection interval for a given PON. However it also reported an FOC date. BellSouth reported that in LON, a sales representative manually updates the version field. As a result, the PON in question was not updated to reflect the current version.

For both of these records, KPMG Consulting accepted BellSouth's explanations as reasonable. See the Closure Report for Exception 131 for additional information on this issue. A Closure Report for Exception 131 has been drafted and contains additional information on this issue.

- PMR 4-3-2 – *Ordering – Percent Rejected Service Requests* – As of the date that the STP final report was issued, KPMG Consulting could not find 18 out of 25 early stage LON (October 2000) records. After research, BellSouth explained seventeen of these discrepancies as being placed in states other than Georgia. BellSouth represented that the remaining missing record had a received date in November 2000, and thus should not be found in the October 2000 raw data files. Additionally, this order was subsequently cancelled, and thus would not be found in the November 2000 data files.

KPMG Consulting accepted BellSouth's explanations as reasonable. A Closure Report for Exception 131 has been drafted and contains additional information on this issue.



- PMR 4-4-1 - *Ordering – Reject Interval* – See PMR 4-3-1 above
- PMR 4-4-2 - *Ordering – Reject Interval* – See PMR 4-3-2 above
- PMR 4-5-1 - *Ordering – Firm Order Confirmation Timeliness* – As of the date that the STP final report was issued, KPMG Consulting found that for three October 2000 LON (non-trunk) orders, the KPMG Consulting-calculated FOC duration did not match the corresponding BellSouth-reported value in the raw data files

BellSouth explained one discrepancy by providing the details of weekend hours that should be excluded from the duration calculation (This information is now detailed in both the *Service Quality Measurements* manual as well as the *Raw Data User Manual* ) The other two LEO orders were partially mechanized, and thus BellSouth used the LEO timestamps for calculating the FOC duration

KPMG Consulting accepted BellSouth's explanations as reasonable. A Closure Report for Exception 131 has been drafted and contains additional information on this issue

- PMR 4-5-2 - *Ordering – Firm Order Confirmation Timeliness* – See PMR 4-3-2 above
- PMR 4-38-1 - *Trunk Group Performance – Trunk Group Service Report* – As of the date of issue of the STP final report, the KPMG Consulting-calculated busy hour for some of the selected November 2000 records did not match the corresponding BellSouth-calculated busy hour

BellSouth explained that this might have been due to the cluster analysis corresponding to a group of records. BellSouth changed its calculations so as not to use cluster analysis

KPMG Consulting retested this test criterion using January 2001 data, and found that the raw data and early stage data agreed. See Exception 89 for additional information on this issue

- PMR 4-39-1 - *Trunk Group Performance – Trunk Group Service Detail* – See PMR 4-38-1 above

The following test cross reference was listed as "Not Complete," but is now "Not Satisfied "

PMR 6-3-2 - *Flow Through* - As of the date that the STP final report was issued, KPMG Consulting had been unable to complete its statistical analysis of the Flow Through metrics, because of the unavailability of data

Since that time, KPMG Consulting received the data from BellSouth. However, based upon its statistical analysis and review, KPMG Consulting has determined that the test CLEC's performance did not exceed the benchmark standard for the levels of disaggregation tested.

### **3.0 Status of ongoing evaluations**

In addition to the findings above, there are also a number of open issues that KPMG Consulting is currently evaluating. The following open Exceptions are part of the Performance Measurements test.

- Exception 79 – BellSouth is currently implementing its new data retention policies, as outlined in its most recent amended response to this exception. It is anticipated that these policies will be fully implemented by the end of the third quarter of 2001. KPMG Consulting will continue to monitor their implementation.
- Exception 86 (issue 1) – *Percent Provisioning Troubles within 30 days of Service Order Completion* – KPMG Consulting continues to be unable to replicate the values BellSouth reports in its monthly SQM reports for the CLEC aggregate and BellSouth retail categories. BellSouth currently believes these issues will be addressed effective with the June 2001 reports published later this month. KPMG Consulting will retest this issue using the June 2001 raw data, and determine whether its calculations and the BellSouth-reported values agree.
- Exception 89 (issue 3) – *Pre-Ordering – OSS Response Interval* – Because of the errors in the raw data previously identified, BellSouth is making changes to its Navigator system. These changes have been addressed for NewLens data, and KPMG Consulting verified that the raw data were accurate, based upon the early stage data.

Similar change requests are expected to be enacted for the ROS, RNS, and TAG systems. BellSouth expects to provide the ROS and RNS data very shortly, with the TAG data being provided in early September.

- Exception 89 (issue 9) – *Percent Provisioning Troubles within 30 days of Service Order Completion* – KPMG Consulting continues to be unable to match the early stage data to the raw data. Earlier, BellSouth had some problems with how the trouble date field was populated, but believes those issues have been addressed.

As soon as all relevant issues (including those relevant to Exception 86, issue 1 above) have been addressed, KPMG Consulting will compare the early stage and raw data. BellSouth believes this analysis should be appropriate using the June 2001 data.

- Exception 122 – BellSouth is currently implementing a change request where orders will use gateway timestamps in duration calculations. A corresponding update will be made to the SQM manual, specifically indicating the use of these timestamps.
- Exception 131 – The Georgia Public Service Commission is currently reviewing KPMG Consulting's closure statement on this Exception.
- Exceptions 136/137 – As discussed in these exceptions, KPMG Consulting had difficulties matching the KPMG Consulting-collected data to the BellSouth-provided data, for the test CLBC, for the ordering metrics.

Based upon the information BellSouth has provided since the issuing of these Exceptions, KPMG Consulting considers these discrepancies resolved, with the exceptions of those relating to the TAG system. BellSouth has indicated that it no longer had the early stage data to research the issues for the TAG discrepancies, because said data are only retained for 45 days from the date of the order.

Notwithstanding the policies detailed in Exception 79, BellSouth intends to retain all the relevant TAG data for these measurements for June 2001 to ensure that it will be able to fully research any discrepancies KPMG Consulting may find. To resolve the remaining issue, KPMG Consulting intends to perform a data integrity comparison of early stage and raw data.

The projected finish date for KPMG Consulting's testing activities mentioned above is the third quarter of 2001. The finish date is associated with the new data retention policies that BellSouth intends to implement during this quarter.